

EXHIBIT 2

Docket Report

Case Description

Case ID: 170300712
Case Caption: B. ETAL VS ROOSEVELT INN LLC ETAL
Filing Date: Friday , March 10th, 2017
Location: CH - City Hall
Case Type: 20 - PERSONAL INJURY - OTHER
Status: CLDBR - DEFERRED - BANKRUPTCY

Related Cases

No related cases were found.

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
10-MAR-2017 08:41 AM	ACTIV - ACTIVE CASE			10-MAR-2017 09:12 AM
Docket Entry: E-Filing Number: 1703025413				
10-MAR-2017 08:41 AM	CIVIJ - COMMENCEMENT CIVIL ACTION JURY	BEZAR, NADEEM A		10-MAR-2017 09:12 AM
Documents: Final Cover				
Docket Entry: none.				
10-MAR-2017 08:41 AM	CMPLT - COMPLAINT FILED NOTICE GIVEN	BEZAR, NADEEM A		10-MAR-2017 09:12 AM
Documents: COMPLAINT.pdf				
Docket Entry: COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.				
10-MAR-2017 08:41 AM	SSCG4 - SHERIFF'S SURCHARGE 4 DEFTS	BEZAR, NADEEM A		10-MAR-2017 09:12 AM
Docket Entry: none.				
10-MAR-2017 08:41 AM	JURYT - JURY TRIAL PERFECTED	BEZAR, NADEEM A		10-MAR-2017 09:12 AM
Docket Entry: 12 JURORS REQUESTED.				
10-MAR-2017 08:41 AM	CLWCM - WAITING TO LIST CASE MGMT CONF	BEZAR, NADEEM A		10-MAR-2017 09:12 AM
Docket Entry: none.				
16-MAR-2017 05:41 PM	AFDVT - AFFIDAVIT OF SERVICE FILED			17-MAR-2017 10:46 AM

Documents: [130671.01_AFFIDAVIT_2EBB2C60-DB7D-0B4A-844F-09397640938E.pdf](#)
[130671.02_AFFIDAVIT_CE92631F-83FB-2549-9744-701C5B781C34.pdf](#)
[130671.03_AFFIDAVIT_B533EC5D-F861-4646-9F17-95D2CE8DA710.pdf](#)

Docket Entry: AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON YAGNA PATEL, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC BY PERSONAL SERVICE ON 03/10/2017 FILED.

23-MAR-2017	AFDVT - AFFIDAVIT OF	BEZAR, NADEEM	24-MAR-2017
04:41 PM	SERVICE FILED	A	02:42 PM

Documents: [Affidavit of Service scanned UFVS.pdf](#)

Docket Entry: AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON UFVS MANAGEMENT COMPANY LLC BY CERTIFIED MAIL ON 03/20/2017 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

05-APR-2017	ENAPP - ENTRY OF	BYERS MS.,	06-APR-2017
03:25 PM	APPEARANCE	JUSTINA L	09:50 AM

Documents: [Entry of Appearance - Roosevelt.pdf](#)

Docket Entry: ENTRY OF APPEARANCE OF JUSTINA L BYERS, GRANT S PALMER, DANIEL E OBERDICK AND JAMES J QUINLAN FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

04-MAY-2017	ANCOM - ANSWER TO	OBERDICK JR.,	05-MAY-2017
04:44 PM	COMPLAINT FILED	DANIEL E	09:08 AM

Documents: [Answer \(FILE\).pdf](#)

Docket Entry: ANSWER WITH NEW MATTER TO PLAINTIFF'S COMPLAINT FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

23-MAY-2017	RPNMT - REPLY TO NEW	MARKS, EMILY B	23-MAY-2017
01:57 PM	MATTER		02:09 PM

Documents: [Minor Plaintiffs Reply to Defendants New Matter.pdf](#)

Docket Entry: REPLY TO NEW MATTER OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

30-MAY-2017	CLLCM - LISTED FOR CASE		30-MAY-2017
12:21 PM	MGMT CONF		12:21 PM

Docket Entry: none.

01-JUN-2017	CLNGV - NOTICE GIVEN		01-JUN-2017
12:30 AM			12:30 AM

Docket Entry: *none.*

20-JUN-2017	CLCCC - CASE MGMT	GIAMPAOLO,	20-JUN-2017
10:22 AM	CONFERENCE COMPLETED	ANTHONY	10:22 AM

Docket Entry: *none.*

20-JUN-2017	CMOIS - CASE MANAGEMENT	20-JUN-2017
10:22 AM	ORDER ISSUED	10:22 AM

Documents: [CMOIS 15.pdf](#)

CASE MANAGEMENT ORDER STANDARD TRACK - AND NOW, 20-JUN-2017, it is Ordered that: 1. The case management and time standards adopted for standard track cases shall be applicable to this case and are hereby incorporated into this Order. 2. All discovery on the above matter shall be completed not later than 01-OCT-2018. 3. Plaintiff shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial to all other parties not later than 01-OCT-2018. 4. Defendant and any additional defendants shall identify and submit curriculum vitae and expert reports of all expert witnesses intended to testify at trial not later than 05-NOV-2018. 5. All pre-trial motions shall be filed not later than 05-NOV-2018. 6. A settlement conference may be scheduled at any time after 05-NOV-2018. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following: (a) A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant; (b) A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount; (c) Defendant shall identify all applicable insurance carriers, together with applicable limits of liability. 7. A pre-trial conference will be scheduled any time after 07-JAN-2019. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following: (a) A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant; (b) A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial; (c) A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial; (d) Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and (e) Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability; (f) Each counsel shall provide an estimate of the anticipated length of trial. 8. It is expected that the case will be ready for trial 04-FEB-2019, and counsel should anticipate trial to begin expeditiously thereafter. 9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this order. ...BY THE COURT: ARNOLD NEW, J.

Docket Entry:

20-JUN-2017	CLLSC - LISTED FOR	20-JUN-2017
10:22 AM	SETTLEMENT CONF	10:22 AM

Docket Entry: *none.*

20-JUN-2017	CLLPT - LISTED FOR PRE-	20-JUN-2017
10:22 AM	TRIAL CONF	10:22 AM

Docket Entry: *none.*

20-JUN-2017 10:22 AM CLLTR - LISTED FOR TRIAL

20-JUN-2017 10:22 AM

Docket Entry: *none.*

20-JUN-2017 10:22 AM ZR236 - NOTICE GIVEN UNDER RULE 236

20-JUN-2017 04:00 PM

Docket Entry: NOTICE GIVEN ON 20-JUN-2017 OF CASE MANAGEMENT ORDER ISSUED ENTERED ON 20-JUN-2017.

27-JUL-2017 10:05 AM STPLT - STIPULATION FILED BEZAR, NADEEM A

27-JUL-2017 01:15 PM

Documents: [\(13\) Stipulation.pdf](#)

Docket Entry: STIPULATION TO AMEND THE COMPLAINT TO NAME ALPHA-CENTURION SECURITY, INC., FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

03-AUG-2017 05:29 PM CERTI - CERTIFICATION FILED MARKS, EMILY B

04-AUG-2017 09:49 AM

Documents: [Certificate Prerequisite US Attorney Phila PD 2nd District.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

09-AUG-2017 09:51 AM CERTI - CERTIFICATION FILED OBERDICK JR., DANIEL E

09-AUG-2017 10:05 AM

Documents: [Cert Prereg_8 8 17.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

14-AUG-2017 06:00 PM CERTI - CERTIFICATION FILED OBERDICK JR., DANIEL E

15-AUG-2017 09:07 AM

Documents: [Cert Prereg_7 24 17.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

05-SEP-2017 10:39 AM CMAMD - AMENDED COMPLAINT FILED BEZAR, NADEEM A

05-SEP-2017 10:56 AM

Documents: [\(16\) Amended Complaint.pdf](#)

Docket Entry: AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY(20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

18-SEP-2017 04:21 PM CERTI - CERTIFICATION FILED MARKS, EMILY B 18-SEP-2017 04:28 PM

Documents: [Certificate Prerequisite Philadelphia DA SVU.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

25-SEP-2017 04:45 PM ANCOM - ANSWER TO COMPLAINT FILED OBERDICK JR., DANIEL E 26-SEP-2017 09:54 AM

Documents: [Answer NMCC \(FILE\).pdf](#)

Docket Entry: ANSWER WITH NEW MATTER AND CROSSCLAIM TO PLAINTIFF'S AMENDED COMPLAINT FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

27-SEP-2017 03:07 PM CMREI - PRAECIPE TO REINSTATE CMPLT BEZAR, NADEEM A 28-SEP-2017 01:16 PM

Documents: [\(18\) Praecipe to Reinstate Amended Complaint.pdf](#)

Docket Entry: AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

29-SEP-2017 04:45 PM DSCIM - DISCOVERY MOTION FILED OBERDICK JR., DANIEL E 02-OCT-2017 08:30 AM

Documents: [MTC Comp Packet \(9-29 FILE\).pdf](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION FOR MORE SPECIFIC ANSWERS TO INTERROGATORIES. HEARING SCHEDULED FOR: OCTOBER 16, 2017 AT 09:00 IN ROOM 602 CITY HALL. (FILED ON BEHALF OF ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY LLC, YAGNA PATEL AND ALPHA-CENTURION SECURITY, INC.)

05-OCT-2017 04:49 PM ENAPC - ENTRY OF APPEARANCE-CO COUNSEL NOCHO, KYLE B 06-OCT-2017 09:02 AM

Documents: [Entry of Appearance.pdf](#)

Docket Entry: ENTRY OF APPEARANCE OF KYLE B NOCHO AS CO-COUNSEL FILED. (FILED ON BEHALF OF M. B.)

05-OCT-2017 04:58 PM RPNMT - REPLY TO NEW MATTER NOCHO, KYLE B 06-OCT-2017 09:02 AM

Documents: [Minor-Plaintiff M.B. Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management and Yagna Patel.pdf](#)

Docket Entry: REPLY TO NEW MATTER OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC FILED. (FILED ON BEHALF OF M. B.)

20-OCT-2017 12:04 PM OBJECT - OBJECTIONS FILED MARKS, EMILY B 23-OCT-2017 09:42 AM

Documents: [Plaintiffs Objections to Subpoena.pdf](#)

Docket Entry: OBJECTIONS TO SUBPOENA PURSUANT TO RULE 4009.21 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

30-OCT-2017 12:03 PM CERTI - CERTIFICATION FILED OBERDICK JR., DANIEL E 31-OCT-2017 09:18 AM

Documents: [CERTI 32_001.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

30-OCT-2017 12:04 PM CERTI - CERTIFICATION FILED OBERDICK JR., DANIEL E 31-OCT-2017 09:18 AM

Documents: [Branham cert prereq 10 27 17.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

30-OCT-2017 12:06 PM CERTI - CERTIFICATION FILED OBERDICK JR., DANIEL E 31-OCT-2017 09:18 AM

Documents: [Davis cert prereq 10 27 17.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

30-OCT-2017 05:07 PM CMREI - PRAECIPE TO REINSTATE CMLPT BEZAR, NADEEM A 31-OCT-2017 09:19 AM

Documents: [Praecipe to Reinstate Amended Compliant2.pdf](#)

Docket Entry: AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF M. B.)

31-OCT-2017 02:20 PM STPLR - STIPULATION FILED OBERDICK JR., DANIEL E 31-OCT-2017 02:46 PM

Documents: [Stipulation.pdf](#)

Docket Entry: 63-17103863 STIPULATION TO SEAL FILED. AWAITING JUDICIAL APPROVAL (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

31-OCT-2017	STASN - STIPULATION	31-OCT-2017
02:48 PM	ASSIGNED	02:48 PM

Docket Entry: 63-17103863 STIPULATION FILED ASSIGNED TO JUDGE: NEW, ARNOLD L. ON DATE: OCTOBER 31, 2017

02-NOV-2017	STPAP - STIPULATION	NEW, ARNOLD L	02-NOV-2017
01:08 PM	APPROVED		01:08 PM

Documents: [STPAP_38.pdf](#)

Docket Entry: 63-17103863 THE PARTIES STIPULATE TO SEAL THE CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA PURSUANT TO PA.R.C.P. 4009.22 ISSUED TO MULTIPLE PROVIDERS, INCLUDING WARREN G. HARDING MIDDLE SCHOOL AND THE WORDSWORTH ACADEMY WHICH WAS FILED ON OCTOBER 30, 2017, E-FILE NO. 171069820. ...SO ORDERED, BY THE COURT; NEW, J. 10-31-17

02-NOV-2017	ZR236 - NOTICE GIVEN UNDER	03-NOV-2017
01:08 PM	RULE 236	05:38 PM

Docket Entry: NOTICE GIVEN ON 03-NOV-2017 OF STIPULATION APPROVED ENTERED ON 02-NOV-2017.

08-NOV-2017	CERTI - CERTIFICATION FILED	NOCHO, KYLE B	08-NOV-2017
01:30 PM			01:33 PM

Documents: [Cert Prereg - Keystone First.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

08-NOV-2017	CERTI - CERTIFICATION FILED	NOCHO, KYLE B	08-NOV-2017
01:32 PM			01:33 PM

Documents: [Cert Prereg - Villa_VisionQuest_JJPI_STOP_New_Directions_VNA_Tabor_First_Home_Care_Philadelphia DHS.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

16-NOV-2017	ORDER - ORDER ENTERED/236	RAU, LISA M	16-NOV-2017
03:33 PM	NOTICE GIVEN		03:33 PM

Documents: [ORDER_42.pdf](#)

Docket Entry: NOTICE OF STANDING ORDER FOR ALL CASES PENDING BEFORE JUDGE LISA M. RAU AND NOW, THIS 15TH DAY OF NOVEMBER, 2017, ALL PARTIES AND COUNSEL

ARE HEREBY NOTIFIED THAT BECAUSE JUDGE LISA RAU'S SPOUSE, LAWRENCE KRASNER, WAS A CANDIDATE FOR DISTRICT ATTORNEY IN PHILADELPHIA, THERE IS A POSSIBILITY THAT SOMEONE INVOLVED IN THIS CASE (COUNSEL, PARTY, OR WITNESS) MAY HAVE MADE A FINANCIAL CONTRIBUTION TO JUDGE RAU'S SPOUSE'S OR ANOTHER DISTRICT ATTORNEY CANDIDATE'S CAMPAIGN FUND OR PAC. ALL COUNSEL AND PARTIES ARE THEREFORE DIRECTED TO REVIEW JUDGE RAU'S STANDING ORDER, AVAILABLE AT [HTTP://WWW.COURTS.PHILA.GOV/PDF/CPCIVIL/RSO.PDF](http://www.courts.phila.gov/pdf/cpcivil/rs0.pdf), WHICH DETAILS THE PROCEDURES THAT THE COURT IS IMPLEMENTING TO ALLOW COUNSEL AND LITIGANTS TO RAISE ANY CONCERNS THEY MAY HAVE WHERE SOMEONE INVOLVED IN A CASE ASSIGNED TO JUDGE RAU HAS MADE CONTRIBUTIONS TO JUDGE RAU'S SPOUSE'S CAMPAIGN FUND OR PAC OR THAT OF ANOTHER CANDIDATE WHO RAN FOR DISTRICT ATTORNEY. BY THE COURT:

LISA M. RAU, J.

16-NOV-2017 03:33 PM	ZR236 - NOTICE GIVEN UNDER RULE 236	21-NOV-2017 05:42 PM
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Docket Entry: NOTICE GIVEN ON 21-NOV-2017 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED ON 16-NOV-2017.

29-NOV-2017 11:16 AM	CMREI - PRAECIPE TO REINSTATE CMPLT	BEZAR, NADEEM A	01-DEC-2017 10:35 AM
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Documents: [Reinstated Amended Complaint \(3\).pdf](#)

Docket Entry: AMENDED COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

04-DEC-2017 05:09 PM	MTSVR - MOTION FOR ALTERNATIVE SERVICE	NOCHO, KYLE B	06-DEC-2017 11:02 AM
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Documents: [Petition for Alternate Service.pdf](#)
[Motion CoverSheet Form](#)

Docket Entry: 86-17120686 MOTION FOR ALTERNATIVE SERVICE (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

06-DEC-2017 11:05 AM	MTASN - MOTION ASSIGNED	06-DEC-2017 11:05 AM
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Docket Entry: 86-17120686 MOTION FOR ALTERNATIVE SERVICE ASSIGNED TO JUDGE: RAU, LISA M. ON DATE: DECEMBER 06, 2017

15-DEC-2017 12:27 PM	ENAPP - ENTRY OF APPEARANCE	WAGNER, THOMAS P	15-DEC-2017 01:28 PM
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Documents: [MB v Alpha Centurion - Entry of Appearance.PDF](#)

Docket Entry: ENTRY OF APPEARANCE OF MELANIE J FOREMAN, THOMAS P WAGNER AND ROBERT W STANKO FILED. (FILED ON BEHALF OF ALPHA-CENTURION SECURITY, INC.)

15-DEC-2017 MTANS - ANSWER WAGNER, 15-DEC-2017
02:14 PM (MOTION/PETITION) FILED THOMAS P 02:17 PM

Documents: [MB v Alpha Centurion - Response to Motion for Alternative Service.PDF](#)
[Motion CoverSheet Form](#)

Docket Entry: 86-17120686 ANSWER IN OPPOSITION OF MOTION FOR ALTERNATIVE SERVICE
FILED. (FILED ON BEHALF OF ALPHA-CENTURION SECURITY, INC.)

22-DEC-2017 ORDER - ORDER ENTERED/236 RAU, LISA M 22-DEC-2017
09:25 AM NOTICE GIVEN 09:25 AM

Documents: [ORDER_49.pdf](#)

Docket Entry: 86-17120686 AND NOW, THIS 21ST DAY OF DECEMBER, 2017, UPON CONSIDERATION
OF PLAINTIFF'S PETITION FOR ALTERNATIVE SERVICE, ANY RESPONSE OF
DEFENDANT, ALPHA-CENTURION SECURITY, INC., THERETO, IT IS HEREBY
ORDERED AND DECREED THAT PLAINTIFF'S PETITION IS DENIED AS MOOT AND
ALPHA-CENTURION SECURITY, INC. IS DEEMED SERVED AS OF THE DATE OF THIS
ORDER. BY THE COURT: HON. LISA M. RAU, 12-21-2017.

22-DEC-2017 ZR236 - NOTICE GIVEN UNDER 22-DEC-2017
09:25 AM RULE 236 03:05 PM

Docket Entry: NOTICE GIVEN ON 22-DEC-2017 OF ORDER ENTERED/236 NOTICE GIVEN ENTERED
ON 22-DEC-2017.

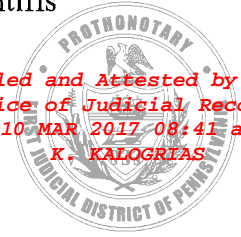
KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs

*Filed and Attested by the
 Office of Judicial Records
 10 MAR 2017 08:41 am
 K. KALOGRIAS*



M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
*d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFE*
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.:

JURY TRIAL DEMANDED

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT
HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS
OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION
ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO
ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) dias a partir de recibir esta demanda y notificacion para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted._

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA
PAGAR A UN ABOGADO, ESTA OFICINA PUEDE
PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE
OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS
REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN
HONORARIO.

SERVICIO de REFERENCIA LEGAL
Uno Reading Centro
Filadelfia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.:

JURY TRIAL DEMANDED

COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1200 cases of sex trafficking has been reported for the first six months of 2016 with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014 the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that directly or indirectly benefits financially from such acts is fully deterred through both criminal and civil prosecution.

THE PARTIES

4. Minor-Plaintiff, M.B. was born on September 3, 1999, and is one of the thousands of victims of human trafficking in the United States. During 2013 and 2014, Minor-Plaintiff was exploited and was permitted to be exploited by traffickers of commercial sex acts and those who financially benefitted from her exploitation. Minor-Plaintiff resides in Philadelphia County, Pennsylvania. Minor-Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102. Minor-Plaintiff's guardian for purposes of this civil action is William A. Calandra, Esquire.

5. Minor-Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Minor-Plaintiff M.B. who incurred injuries and damages starting when she was fourteen (14) years old.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as "Roosevelt Inn LLC"] is a corporation duly organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the "Roosevelt Inn"].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as "Roosevelt Motor Inn, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a corporation duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. and UFVS Management Company, LLC regularly conduct business in Philadelphia County.

11. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel acted individually and/or by and

through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

12. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

13. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur and profited from them.

14. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

15. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel received money and financially profited from the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

16. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3001, et. seq., it is a felony to recruit, entice, solicit, harbor or transport a minor which results in the minor being subjected to sexual servitude.

17. Commencing in 2013, Minor-Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

18. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided, for their own financial benefit, rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts with Minor-Plaintiff.

19. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts.

20. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

21. Minor-Plaintiff's traffickers put up internet advertisements for the purpose of prostituting Minor-Plaintiff.

22. The advertisements would include a fake name for Minor-Plaintiff and a phone number to call.

23. During the phone call, sex for cash was negotiated and the caller "John" would be informed that Minor-Plaintiff was at the Roosevelt Inn.

24. The "John" who negotiated to have sex for cash with Minor-Plaintiff would then speak to the front desk clerk at the Roosevelt Inn.

25. An individual named "Abdul" would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of "Abdul" is known to Defendants.

26. "Abdul" would then direct the individual to the floor and room where Minor-Plaintiff and her traffickers were staying.

27. "Abdul" was fully aware that Minor-Plaintiff and other underage children were compelled to perform sex for money.

28. Minor-Plaintiff's traffickers would linger in the halls and on the premises of the Roosevelt Inn.

29. The motel room where Minor-Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

30. Minor-Plaintiff engaged in numerous commercial sex acts "dates" per day.

31. Minor-Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

32. Minor-Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Minor-Plaintiff.

33. Minor-Plaintiff exhibited fear and anxiety while on the premises of the Roosevelt Inn.

34. Minor-Plaintiff's traffickers paid cash for the motel rooms where Minor-Plaintiff engaged in commercial sex acts.

35. Minor-Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Minor-Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

36. Men and other minors frequently entered and left the rooms where Minor-Plaintiff engaged in commercial sex acts.

37. Men stood in the hallways outside of rooms where Minor-Plaintiff was engaged in commercial sex acts.

38. Minor-Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

39. Minor-Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

40. Housekeepers and front desk staff including "Abdul" at the Roosevelt Inn maintained conversations with Minor-Plaintiff and had knowledge that Minor-Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

41. Minor-Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

42. Minor-Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash as payment for the motel rooms to the financial profit of all Defendants as owners, operators and managers of the Roosevelt Inn.

43. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS

Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

44. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel financially profited from the continuation of the commercial sex acts committed on the premises of the Roosevelt Inn through both the renting of rooms and the providing of services.

45. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

46. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

47. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

**COUNT I - NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.**

**M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT
MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL**

48. The averments of Paragraphs 1 through 47 are incorporated herein by reference.

49. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

50. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

51. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

52. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human trafficking and continued profit by not reporting, intervening, disrupting or otherwise stopping the practice.

53. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against all Defendants and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT II – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

54. The averments of paragraphs 1 through 53 are incorporated herein by reference.

55. By harboring Minor-Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

56. As a result of Defendants' negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

57. As a result of Defendants' negligence, Defendants financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

58. Defendants acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against all Defendants and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

59. The averments of paragraphs 1 through 58 are incorporated herein by reference.

60. Defendants negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

61. Defendants acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against all Defendants and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT IV – INTENTIONAL INFLCITION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

62. The averments of paragraphs 1 through 61 are incorporated herein by reference.

63. By harboring Minor-Plaintiff to perform commercial sex acts, Defendants intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

64. Defendants acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against all Defendants and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.
Attorneys for Plaintiff

BY: 
THOMAS R. KLINE, ESQUIRE

BY: 
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

DATED: 3/10/17

VERIFICATION

I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter. I hereby verify that I have reviewed the foregoing Minor-Plaintiff's Complaint, which was prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'W.A. Calandra', is written over a horizontal line.

WILLIAM A. CALANDRA, ESQUIRE
Guardian for Minor-Plaintiff M.B.



235 SOUTH 21ST STREET
PHILADELPHIA, PA 19107
PHONE: (215) 546-7400
FAX: (215) 985-0169



M.B., minor by her Guardian, William A. Calandra, Esquire c/o Kline
& Specter, P.C.

-VS-

Roosevelt Inn, LLC dba Roosevelt Inn and Roosevelt Inn Cafe, et al

COURT Court of Common Pleas of Pennsylvania
Philadelphia County - Civil

CASE NUMBER 1703-0712

Filed and Attested by the
Office of Judicial Records
16 MAR 2017 05:41 pm
A. SILIGRINI

AFFIDAVIT

State of Pennsylvania
County of Philadelphia

B&R Control # PS130571.01

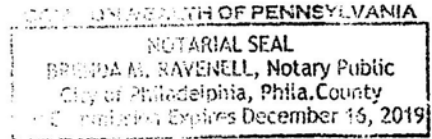
Reference Number

Thomas Kenney, being duly sworn according to law, deposes and says that he/she is the process server/sheriff herein named, and that the facts set forth below are true and correct to the best of their knowledge, information and belief.

On 3/10/2017 we received the **Complaint** and that service was effected upon **Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe at 7630 Roosevelt Boulevard, Philadelphia, PA 19152** on 03/10/2017 at 1:37 PM, in the manner described below:

By service upon: Yagna Patel, as an agent or person authorized to accept service at usual place of business.

Service Notes:



Sworn to and subscribed before me this

16th day of March 2017

Process Server/Sheriff

Notary Public

ATTEMPTS:

Client Phone (215) 772-1000

: Filed Date: 03/10/2017 BR Serve By: 03/10/2017

Thomas R. Kline, Esquire
Kline and Specter, P.C.
1525 Locust Street
19th Floor
Philadelphia, PA 19102



ORIGINAL

Case ID: 170300712



Case 2:17-cv-00984-GEKP Document 1-2 Filed 07/02/21 Page 27 of 476
 203 S. 21st Street
 PHILADELPHIA, PA 19107
 PHONE: (215) 546-7400
 FAX: (215) 985-0169



M.B., minor by her Guardian, William A. Calandra, Esquire c/o Kline
 & Specter, P.C.

-VS-

Roosevelt Inn, LLC dba Roosevelt Inn and Roosevelt Inn Cafe, et al

COURT Court of Common Pleas of Pennsylvania
 Philadelphia County - Civil

CASE NUMBER 1703-0712

Filed and Attested by the
 Office of Judicial Records
 16 MAR 2017 05:41 pm
 A. SILIGRINI

AFFIDAVIT

State of Pennsylvania
 County of Philadelphia

B&R Control # PS130371.02

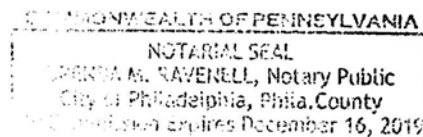
Reference Number

Thomas Kenney, being duly sworn according to law, deposes and says that he/she is the process server/sheriff herein named, and that the facts set forth below are true and correct to the best of their knowledge, information and belief.

On 3/10/2017 we received the **Complaint** and that service was effected upon **Roosevelt Motor Inn, Inc. dba Roosevelt Motor Inn at 7630 Roosevelt Boulevard, Philadelphia, PA 19152** on **03/10/2017 at 1:37 PM**, in the manner described below:

By service upon: Yagna Patel, as an agent or person authorized to accept service at usual place of business.

Service Notes:



Sworn to and subscribed before me this

16th day of March 2017

Brenda Parnell
 Notary Public

Process Server/Sheriff

[Signature]

ATTEMPTS:

Client Phone (215) 772-1000

: **Filed Date:** 03/10/2017 **BR Serve By:** 03/10/2017

Thomas R. Kline, Esquire
 Kline and Specter, P.C.
 1525 Locust Street
 19th Floor
 Philadelphia, PA 19102



ORIGINAL

Case ID: 170300712



205 SOUTH 23RD STREET
PHILADELPHIA, PA 19107
PHONE: (215) 546-7400
FAX: (215) 985-0169



M.B., minor by her Guardian, William A. Calandra, Esquire c/o Kline
& Specter, P.C.

-VS-

Roosevelt Inn, LLC dba Roosevelt Inn and Roosevelt Inn Cafe, et al

COURT Court of Common Pleas of Pennsylvania
Philadelphia County - Civil

CASE NUMBER 1703-0712

Filed and Attested by the
Office of Judicial Records
16 MAR 2017 05:41 pm
A. SILIGRINI

AFFIDAVIT

State of Pennsylvania
County of Philadelphia

B&R Control # PS150571.03

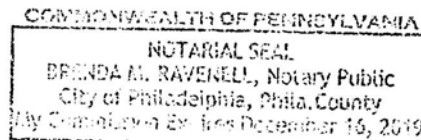
Reference Number

Thomas Kenney, being duly sworn according to law, deposes and says that he/she is the process server/sheriff herein named, and that the facts set forth below are true and correct to the best of their knowledge, information and belief.

On 3/10/2017 we received the **Complaint** and that service was effected upon **Yagna Patel at 7630 Roosevelt Boulevard, Philadelphia, PA 19152** on **03/10/2017** at **1:37 PM**, in the manner described below:

By personal service upon: Yagna Patel

Service Notes:



Sworn to and subscribed before me this

16th day of March 2017

Process Server/Sheriff

Notary Public

ATTEMPTS:

Client Phone (215) 772-1000

: Filed Date: 03/10/2017 BR Serve By: 03/10/2017

Thomas R. Kline, Esquire
Kline and Specter, P.C.
1525 Locust Street
19th Floor
Philadelphia, PA 19102



ORIGINAL

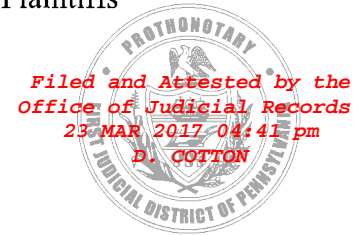
Case ID: 170300712

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 0712

JURY TRIAL DEMANDED

**AFFIDAVIT OF SERVICE OF COMPLAINT UPON DEFENDANT,
UFVS MANAGEMENT**

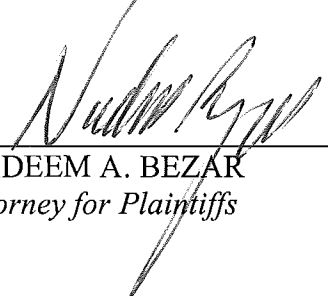
COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA :

NADEEM A. BEZAR, ESQUIRE, being duly sworn according to law, deposes and states that a time-stamped copy of Plaintiffs' Complaint and Notice to Defend filed in the above-captioned matter was served via certified mail, return receipt requested upon defendant UFVS Management, 287 Bowman Avenue, Purchase, NY 10577. Your deponent further states that attached hereto and marked as Exhibit "A" are copies of the transmittal letter and signed certified mail return receipt card showing receipt on March 20, 2017.

KLINE & SPECTER, P.C.

BY:




NADEEM A. BEZAR
Attorney for Plaintiffs

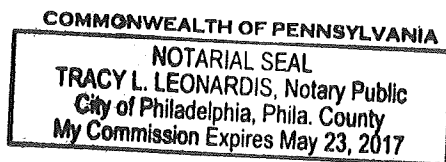
Sworn to and subscribed

before me this 23 day of

March, 2017.



Notary Public



U.S. Postal Service™
CERTIFIED MAIL RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee \$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage \$

Total Postage and Fees \$

Sent To *UFVS Management*
287 Bowman Ave
Purchase NY 10577

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

KLINE & SPECTER PC
 ATTORNEYS AT LAW
 25 LOCUST STREET
 PHILADELPHIA, PENNSYLVANIA 19102
 W.KLINESPECTER.COM

NADEEM.BEZAR@KLINESPECTER.COM

215-772-0522
 FAX: 215-772-1005

Postmark
 Here

March 10, 2017

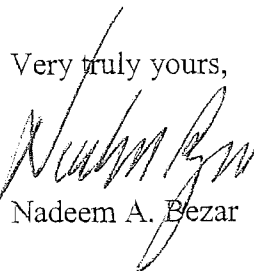
VIA REGISTERED MAIL
RETURN RECEIPT REQUESTED
 UFVS Management Company, LLC
 287 Bowman Avenue
 Purchase, NY 10577

Re: *M.B. v. Roosevelt Inn LLC, et. al.*
Court of Common Pleas, Philadelphia County
March Term, 2017, No.00712

Dear Sir/Madam:

Please be advised that you have been sued in the Philadelphia County Court of Common Pleas of Pennsylvania. If you wish to defend against the claims set forth in the Complaint enclosed herein, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice.

Please be guided accordingly.

Very truly yours,

 Nadeem A. Bezar

NAB/cal
 Enclosures

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

UFVS Management
287 Bowman Ave.
Purchase, NY 10577



9590 9402 2347 6225 4965 98

2. Article Number (Transfer from service label)

7016 2070 0001 1802 6063

PS Form 3811, July 2015 PSN 7530-02-000-9053

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

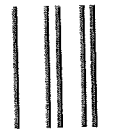
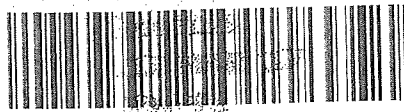
3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

(over \$500) Restricted Delivery

Domestic Return Receipt

USPS TRACKING#



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

9590 9402 2347 6225 4965 98

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Kline and Specter
Nadeem A. Bezar, Esq
1525 Locust St
Phila, PA 19102

Beason

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
 Attorney Bar I.D. No.: 57686
 James J. Quinlan, Esquire
 Attorney Bar I.D. No.: 200944
 Justina L. Byers, Esquire
 Attorney Bar I.D. No.: 76773
 Daniel E. Oberdick, Esquire
 Attorney Bar I.D. No.: 309676
 One Logan Square
 130 North 18th Street
 Philadelphia, PA 19103-6998
 Tel.: (215) 569-5500
 Fax: (215) 569-5555
 Email: palmer@blankrome.com
 quinlan@blankrome.com
 byers@blankrome.com
 doberdick@blankrome.com

*Attorneys for Defendants,
 Attorneys for Defendants,
 Roosevelt Inn LLC d/b/a Roosevelt Inn and
 Roosevelt Inn Café, Roosevelt Motor Inn,
 d/b/a Roosevelt Motor Inn,
 UFVS Management Company, LLC and
 Yagna Patel*



M.B., minor by her Guardian,
 William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
 d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFÉ,

and

ROOSEVELT MOTOR INN, INC.
 d/b/a ROOSEVELT MOTOR INN,

and

UFVS MANAGEMENT COMPANY, LLC,

and

YAGNA PATEL,

Defendants.

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY
 CIVIL TRIAL DIVISION

MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter the appearances of the Grant S. Palmer, Esquire LLP, James J. Quinlan, Esquire, Justina L. Byers, Esquire and Daniel E. Oberdick, Esquire of Blank Rome as counsel on behalf of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel in the above-captioned matter.

BLANK ROME LLP

Dated: April 5, 2017

/s/ Grant S. Palmer
Grant S. Palmer, Esquire
Attorney Bar I.D. No.: 57686

/s/ James J. Quinlan
James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944

/s/ Justina L. Byers
Justina L. Byers, Esquire
Attorney I.D. No.: 76773

/s/ Daniel E. Oberdick
Daniel E. Oberdick, Esquire
Attorney Bar I.D. No.: 309676
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103-6998
Tel.: (215) 569-5500
Fax: (215) 569-5555

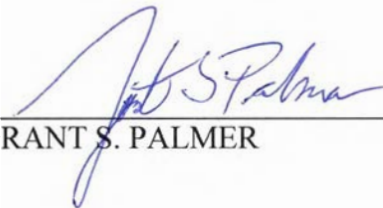
*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

CERTIFICATE OF SERVICE

I, Grant S. Palmer, Esquire, hereby certify that, on this 5th day of April 2017, I caused to be served true and correct copies of the foregoing Entry of Appearance to be served via U.S. mail, postage prepaid, upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*



GRANT S. PALMER

TO: **Plaintiff:** YOU ARE HEREBY NOTIFIED TO
FILE A WRITTEN RESPONSE TO THE ENCLOSED
NEW MATTER WITHIN TWENTY (20) DAYS FROM
SERVICE HEREOF OR A *Filed and Attested by the*
JUDGMENT MAY BE *Office of Judicial Records*
ENTERED AGAINST YOU. *04 MAY 2017 04:44 pm*
P. MARTIN

By: /s/ Grant S. Palmer
Attorney for Defendants Roosevelt Inn, LLC, et al.

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
Attorney Bar I.D. No.: 57686
James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944
Justina L. Byers, Esquire
Attorney Bar I.D. No.: 76773
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*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S ANSWER
TO PLAINTIFF'S COMPLAINT WITH NEW MATTER**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively “Defendants”), by and through counsel, Blank Rome LLP, hereby file their Answer with New Matter to minor Plaintiff M.B.’s (hereinafter “Plaintiff”) Complaint as follows:

1. Denied as stated. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

2. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

3. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

4. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

5. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

6. Admitted in part; denied in part. It is admitted only that Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café is a Delaware corporation with a business at the address alleged. The remaining averments contained in this paragraph are conclusions of law to which no

responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

7. Admitted in part; denied in part. It is admitted only that Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn is a Pennsylvania corporation. The remaining averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

8. Denied. UFVS Management Company, LLC is a limited liability company, not a corporation. The remaining averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

9. Admitted in part; denied in part. It is admitted only that Yagna Patel was involved in the management of the Roosevelt, Inn. The remaining averments contained in this paragraph are denied. Strict proof is demanded at time of trial.

10. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

11. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

12. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

13. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

14. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

15. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

16. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

17. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

18. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

19. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

20. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

21. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

22. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

23. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are

therefore denied and strict proof thereof is demanded at time of trial.

24. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

25. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

26. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

27. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

28. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are

therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

29. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

30. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

31. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

32. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

33. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

34. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

35. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

36. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

37. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that

any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

38. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

39. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

40. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

41. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

42. Denied. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

43. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

44. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

45. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

46. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or

omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

47. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

**COUNT I – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 PA.C.S.A. § 3001, ET. SEQ.**

**M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT
MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL**

48. Denied. To the extent a response is required, Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

49. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

50. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

51. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries.

Strict proof is demanded at time of trial. Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph concerning harms suffered by plaintiff.

52. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

53. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Defendants request judgment in their favor and against Plaintiff together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT II – NEGLIGENCE

M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

54. Denied. To the extent a response is required, Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

55. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or

omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

56. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants were negligent at any time material hereto. By way of further response, after reasonable investigation, Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

57. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants were negligent at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

58. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Defendants requests judgment in their favor and against Plaintiff together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT III – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

59. Denied. To the extent a response is required, Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

60. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants were negligent at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

61. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Defendants request judgment in their favor and against Plaintiff together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

62. Denied. To the extent a response is required, Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

63. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

64. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Defendants request judgment in their favor and against Plaintiff together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

NEW MATTER

65. Defendants hereby incorporate by reference the preceding paragraphs of this Answer as if fully set forth herein.

66. Plaintiff's Complaint fails to state any claim against Defendants upon which relief may be granted.

67. The alleged incident was not caused by the negligence, negligence per se,

recklessness, carelessness, or violation of statute, code, regulation or standard of Defendants.

68. The injuries, losses, or damages suffered by Plaintiff were not proximately caused by Defendants.

69. Plaintiff's claims of damages, which are specifically denied, were not proximately caused by any acts and/or omissions of Defendants, their employees, servants or agents.

70. Any harm or injury suffered by Plaintiff was caused by Plaintiff's own actions and/or inactions.

71. The alleged incident was caused by the negligence, recklessness and/or carelessness of Plaintiff and/or other persons or parties other than Defendants.

72. Plaintiff's actions and/or inactions were negligent and such negligence was a superseding, intervening cause of the alleged accident that bars or limits all claims by Plaintiff.

73. Plaintiff's claims are the result of acts or omissions of other individuals or entities whose acts or omissions constituted intervening and/or superseding causes over which Defendants had no control and which Defendants could not foresee.

74. No conduct, actions, inaction, or omissions on the part of Defendants caused or contributed to Plaintiff's injuries or damages, if any.

75. Defendants were not negligent, careless and/or reckless at any time material hereto.

76. Plaintiff has failed to join all indispensable parties.

77. Plaintiff's Complaint is barred or limited by the appropriate statute of limitations or statute of repose.

78. Plaintiff's Complaint is barred or limited by the doctrine of waiver, estoppel, res judicata and/or laches.

79. Plaintiff's claims are barred or limited by the doctrine of spoliation.

80. Plaintiff's claims are barred or limited by the doctrines of contributory negligence, comparative negligence, and/or assumption of the risk.

81. Plaintiff's Complaint is barred or limited by Plaintiff's failure to mitigate damages.

82. The injuries and damages complained of by Plaintiff pre-existed or are unrelated to the incident or occurrence which is the subject matter of Plaintiff's Complaint.

83. Plaintiff's claims for damages, if any, are excessive and unsupported and, therefore, must be barred or limited.

84. Defendants owed no duty of care to Plaintiff.

85. To the extent that Defendants owed a duty to Plaintiff, which is denied, Defendants did not breach any duty.

86. A party other than Defendants directed, supervised, and controlled the premises where Plaintiff was allegedly injured.

87. Any acts or omissions of Defendants were not substantial causes of and did not result in the injuries and/or losses alleged by Plaintiff.

88. Plaintiff fails to state a claim under Pennsylvania's Human Trafficking Law, 18 Pa.C.S. § 3001, *et seq.*

89. The alleged causes of action contained in Plaintiff's Complaint are barred by any and all applicable affirmative defenses explicitly set forth in Pa.R.C.P. 1030(a).

WHEREFORE, Defendants request judgment in their favor and against Plaintiff together

with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

BLANK ROME LLP

/s/ Grant S. Palmer

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 4, 2017

VERIFICATION

I, YAGNA PATEL, hereby verify that I am a party to this action and that the facts contained in the foregoing Answer with New Matter are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: 5/3/17, 2017

By: Yagna Patel
MANAVER

VERIFICATION

I, ANTHONY UZZO, hereby verify that I am authorized to execute this verification on behalf of Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, and the Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, and that the facts contained in the foregoing Answer with New Matter are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: 5/3/17, 2017

By: 

VERIFICATION

I, ANTHONY UZZO, hereby verify that I am authorized to execute this verification on behalf of UFVS Management Company, LLC, and that the facts contained in the foregoing Answer with New Matter are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: 5/3/17, 2017

By:

A handwritten signature in blue ink, appearing to be "Anthony Uzzo", written over a horizontal line.

CERTIFICATE OF SERVICE

I, Grant S. Palmer, Esquire, hereby certify that, on this 4th day of May 2017, I caused to be served true and correct copies of the foregoing Answer with New Matter to be served via the Court's E-Filing system and/or other electronic mail, upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

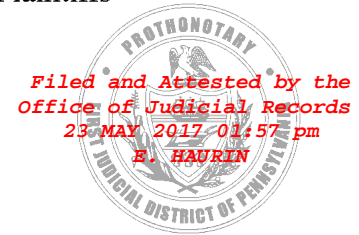
/s/ Grant S. Palmer
GRANT S. PALMER

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**MINOR-PLAINTIFF M.B.'S REPLY TO NEW MATTER OF DEFENDANTS
 ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC.,
UFVS MANAGEMENT AND YAGNA PATEL**

Minor-Plaintiff, by and through counsel, Kline & Specter, P.C., hereby replies to New Matter of Defendants, Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel (collectively, "Defendants") as follows:

65. This is an incorporation paragraph to which no response is required.

66. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

67. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

68. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

69. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

70. Denied. It is specifically denied that any harm or injury suffered by Minor-Plaintiff was caused by Minor-Plaintiff's own actions and/or inactions. Strict proof of Defendants' allegations is hereby demanded.

71. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

72. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendant's allegations is hereby demanded.

73. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

74. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

75. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

76. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

77. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

78. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

79. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

80. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

81. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

82. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

83. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

84. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

85. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

86. Denied. This paragraph is a conclusion of law to which no response is required.
To the extent the allegations in this Paragraph are deemed factual in nature and a response is
required, the same are denied. Strict proof of Defendants' allegations is hereby demanded.


87. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

88. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

89. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against
Defendants and demands compensatory damages in excess of Fifty Thousand (\$50,000.00)
Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

Dated: 5/23/17

VERIFICATION

I, EMILY B. MARKS, ESQUIRE, hereby state that I am the attorney for the Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff M.B.'s Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



EMILY B. MARKS, ESQUIRE
Attorney for Minor-Plaintiff

Dated: 5/23/17

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23 day of May, 2017, the foregoing Minor-Plaintiff's Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel was electronically filed and upon acceptance electronically served upon the below listed counsel:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

KLINE & SPECTER, P.C.

BY: _____


EMILY B. MARKS, ESQUIRE
Attorney for Minor-Plaintiff

Date: _____

5/23/17

From: scheduling.notices@courts.phila.gov
To: [Martinez Perez, Mla](#)
Subject: Notice of Court Event
Date: Wednesday, May 31, 2017 6:05:43 PM

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL

JUSTINA BYERS
ONE LOGAN SQUARE
PHILADELPHIA, PA 19103

B. ETAL VS ROOSEVELT INN LLC ETAL
170300712

SCHEDULING ORDER

AND NOW, MAY 31, 2017, it is hereby Ordered that:

1. A Case Management Conference is scheduled on June 20, 2017, at 10:00 A.M., in Courtroom 613, City Hall, Philadelphia, PA 19107.
2. Counsel for Plaintiff is directed to serve a copy of the Order on any unrepresented party or any attorney entering an appearance subsequent to the issuance of this Order.
3. Attendance by all counsel of record and unrepresented parties is mandatory.
4. Five (5) days prior to the conference, all parties are required to electronically file with the Court and serve upon all opposing counsel and/or opposing parties not electronically served by the court a fully completed Case Management Memorandum. To electronically file the Case Management Memorandum, access the "Existing Case" section of the court's electronic filing system. Select "Conference Submissions" as the filing category. Select "Management Memorandum" as the filing type. A hard copy of the electronically filed Memorandum must be presented at the time of the Conference.
5. The Conference will be conducted by a Civil Case Manager who shall act on behalf of the Honorable ARNOLD NEW.
6. This case has been presumptively assigned to the MAJOR JURY-STANDARD Case Management Track. Accordingly, trial of this case will occur on or shortly after 01-OCT-18.

SCHEDULING ORDER - Page 2

B. ETAL VS ROOSEVELT INN LLC ETAL
170300712

7. Within sixty (60) days of the commencement of the action, counsel for the plaintiff(s) and defendant(s) shall meet or confer for an initial discovery conference, where the parties shall make a good faith effort to agree upon a proposed discovery plan as well as a proposed projected pretrial Court event schedule. If service of the Complaint is not effectuated within sixty (60) days of commencement of the action, the parties shall meet or confer for the initial discovery conference within thirty (30) days of service thereof, provided that the discovery conference is held prior to the scheduled Case Management Conference.
8. At the Case Management Conference, counsel shall present a mutually agreed upon discovery plan and proposed pretrial court event schedule. The discovery plan shall not alter or adjust the projected trial date. If the parties cannot agree on a jointly submitted discovery plan or projected pretrial court event schedule, the court will impose one at the conclusion of the conference. Counsel must also be prepared to address all relevant issues regarding venue, service of process, pleadings, discovery, possible joinder of additional parties, theories of liability or defense and damages claimed.
9. If the case settles prior to the conference, electronically file a settlement letter. To file the letter electronically, access the "Existing Case" section of the court's electronic filing system. Select "Conference Submissions" as the filing category. Select "Settlement Letter" as the document type. Questions concerning this Order and its contents shall be referred to 215-686-3710.

Click the following link to access important documents related to the scheduled event.

https://uridefense.proofpoint.com/v2?url?u=http-3A__www.courts.phila.gov_pdf_forms_civil_01-2D105-2Dcmcm.pdf&d=DwIFAg&c=qmgb7o64HbcJ-G-pnw2rSw&r=0BaHENCgTO8JLr4YKF8BSKut_hWe7IK55zgAgv3nRwQ&m=4UzRFIvJKIC0TEna8sr8ZLg7ByMH4zOxWk_CHAAdhDZ4&s=wznRe6PV2dAiYc2vkdURYPYJPhGHervLQFgmqYgidJM&e=

OFFICE OF CHIEF DEPUTY
COURT ADMINISTRATOR

DISCLAIMER

The First Judicial District will use your electronic mail address and other personal information only for purposes of Electronic Filing as authorized by Pa. R.C.P. 205.4 and Philadelphia Civil *Rule 205.4.

Use of the Electronic Filing System constitutes an acknowledgment that the user has read the Electronic Filing Rules and Disclaimer and agrees to comply with same.

This is an automated e-mail, please do not respond!



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION – CIVIL

B. ETAL

VS

ROOSEVELT INN LLC ETAL

March Term 2017

No. 00712

DOCKETED
CIVIL CASE MANAGEMENT

JUN 19 2017

A. GIAMPAOLO

**CASE MANAGEMENT ORDER
STANDARD TRACK**

B. Etal Vs Roosevelt In-CMOIS



17030071200015

AND NOW, *Tuesday, June 20, 2017*, it is Ordered that:

1. The case management and time standards adopted for standard track cases shall be applicable to this case and are hereby incorporated into this Order.
2. All *discovery* on the above matter shall be completed not later than **01-OCT-2018**.
3. *Plaintiff* shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial to all other parties not later than **01-OCT-2018**.
4. *Defendant and any additional defendants* shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial not later than **05-NOV-2018**.
5. All *pre-trial motions* shall be filed not later than **05-NOV-2018**.
6. A *settlement conference* may be scheduled at any time after **05-NOV-2018**. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a). A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant;
 - (b). A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount;
 - (c). Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
7. A *pre-trial conference* will be scheduled any time after **07-JAN-2019**. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following:

- (a). A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
 - (b). A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c). A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d). Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
 - (e). Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;
 - (f). Each counsel shall provide an estimate of the anticipated length of trial.
8. *It is expected that the case will be ready for trial 04-FEB-2019*, and counsel should anticipate trial to begin expeditiously thereafter.
9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this Order.

BY THE COURT:



ARNOLD NEW, J.
TEAM LEADER

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL

Defendants

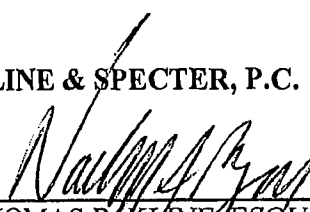
PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712
JURY TRIAL DEMANDED

Filed and Attested by the
Office of Judicial Records
37 JUL 2017 10:05 am
C. FORTE

STIPULATION

BY WAY OF STIPULATION AND AGREEMENT, amongst the parties by the signatures of the undersigned counsel, it is hereby **STIPULATED AND AGREED** by consent of the parties that Minor-Plaintiff M.B., by and through her Guardian William A. Calandra, Esquire shall and may amend the Complaint to name Alpha-Centurion Security, Inc., possibly otherwise known as Alpha Century Security, Inc., as a defendant.

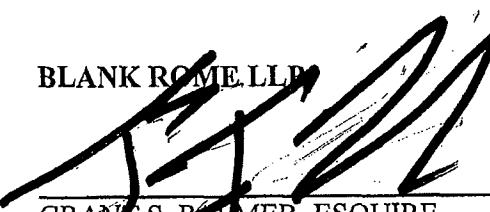
KLINE & SPECTER, P.C.


THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff M.B.,
Minor by her Guardian, William A.
Calandra, Esquire

Date:

7/7/17

BLANK ROMELLE

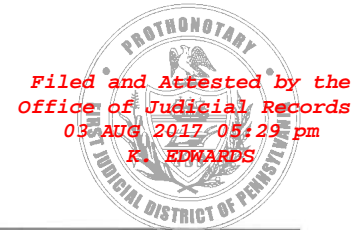

GRANT S. PALMER, ESQUIRE
JAMES J. QUINLAN, ESQUIRE
JUSTINA L. BYERS, ESQUIRE
DANIEL E. OBERDICK, ESQUIRE
Attorneys for Defendants Roosevelt Inn
LLC d/b/a Roosevelt Inn and Roosevelt Inn
Café, Roosevelt Motor Inn, Inc. d/b/a
Roosevelt Motor Inn, UFVS Management
Company, LLC and Yagna Patel

Date:

7/17/17

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000



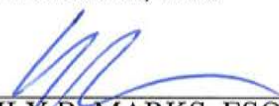
M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY: 
EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs

Date: 8/3/17

CERTIFICATE OF SERVICE

I, Emily B. Marks, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 8/3/17



EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
 DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
 TO RULE 4009.21**

Plaintiffs intend to serve subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the Subpoenas. If no objection is made, the Subpoenas may be served.

- Philadelphia Police Department, 2nd District
- U.S. Attorney's Office, Eastern District of Pennsylvania

KLINE & SPECTER, P.C.

BY:


 EMILY B. MARKS, ESQUIRE
 Attorney for Plaintiffs

Date:

7/7/17

CERTIFICATE OF SERVICE

I, Emily B. Marks, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via First Class Mail on the date below:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date:

7/7/17



EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA POLICE DEPARTMENT, 2ND DISTRICT
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

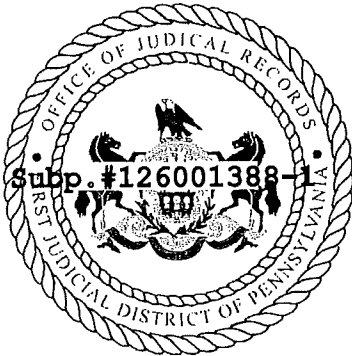
Date: June 30, 2017

Name: Marks, Emily B
Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-0524

Supreme Court ID#: 204405

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA POLICE DEPARTMENT, 2ND DISTRICT
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

**PHILADELPHIA POLICE DEPARTMENT
2nd DISTRICT**

Harbison Avenue and Levick Street
Philadelphia, PA 19149

**Re: ROOSEVELT INN
7630 Roosevelt Boulevard
Philadelphia, PA 19152**

You are to provide all records pertaining to any reports or any investigations of criminal activity, including but not limited to prostitution, solicitation, and human trafficking, at the Roosevelt Inn from 2012 to the present, including any and all related arrest reports, incident reports, reports of telephone calls made from the Roosevelt Inn, witness statements, handwritten notes, typed reports, Affidavits of Probable Cause, information filed, related criminal records, recorded interviews, transcribed statement, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, and any other documents in your file relating to the Roosevelt Inn.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: U.S. ATTORNEY, EASTERN DISTRICT OF PENNSYLVANIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: July 07, 2017

Name: Marks, Emily B
Address: KLINE & SPECTER, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 204405

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: U.S. ATTORNEY, EASTERN DISTRICT OF PENNSYLVANIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO:

U.S. ATTORNEY, EASTERN DISTRICT OF PENNSYLVANIA

U.S. Attorney's Office

615 Chestnut Street, Suite 1250

Philadelphia, PA 19106

Attn: Custodian of Records

Re: Daiquan Davis; USA v. Davis, E.D.Pa. Docket # 2:15-cr-00327

You are to provide your complete file regarding **Daiquan Davis**, Defendant in U.S.A. v. Davis, Docket No. 2:15-cr-00327, E.D. Pa., including any and all guilty pleas, dockets, arrest reports, witness statements, handwritten notes, typed reports, Affidavits of Probable Cause, information filed, prior criminal records relating to Daiquan Davis, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, pre-trial memoranda, and any other documents in your file relating to the above-referenced docket number.

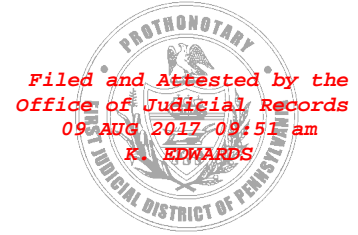
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Court of Common Pleas
Calandra, Esquire

vs.

Case Number: 170300712

Roosevelt Inn LLC, Roosevelt Motor Inn,
Inc., UFVS Management Co, LLC, and
Yagna Patel



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 08/08/2017

Litigation Solutions, LLC on behalf of

Justina Byers, Esquire

Attorney for the Defendant

CC:
Justina Byers, Esquire
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

**M.B., a minor by her Guardian, William A. Calandra, Esquire
vs.
Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
Patel**

Court of Common Pleas

170300712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY
PURSUANT TO RULE 4009.21**

Provider:

Record Type:

Security Tech Specialist 007

Miscellaneous

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 07/14/2017

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf
of:

Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

**COUNSEL LISTING FOR M.B., A MINOR BY HER GUARDIAN, WILLIAM A. CALANDRA, ESQUIRE VS.
ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT CO, LLC, AND YAGNA PATEL**

County of Philadelphia Court of Common Pleas

Counsel

Kline, Esquire, Thomas R.

Firm

1525 Locust Street 19th Floor
Philadelphia, PA 19102
P: 215-772-1000 F: 215-735-0937

Counsel Type

Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17
No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Security Tech Specialist 007
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

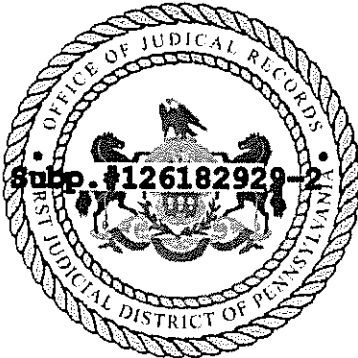
Date: July 14, 2017

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logal Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Security Tech Specialist 007
P.O. Box 554
Feasterville Trevose PA 19053
Attention: Records Department

Subject: Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe, Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe

Requested Items:

Please Remit: DVRs or other recording devices that were in use between the years 2013 through 2016 at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152; and Any data, recordings and/or any other information that was stored on the DVRs or recording devices to be sent to **Blank Rome LLP 130 North 18th St. One Logan Square Philadelphia PA 19103****

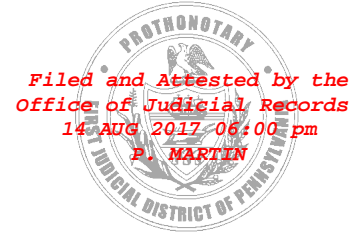
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Court of Common Pleas
Calandra, Esquire

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Case Number: 170300712

Roosevelt Inn LLC, Roosevelt Motor Inn,
Inc., UFVS Management Co, LLC, and
Yagna Patel



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 08/14/2017

Litigation Solutions, LLC on behalf of

Justina Byers, Esquire

Attorney for the Defendant

CC:
Justina Byers, Esquire
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

**M.B., a minor by her Guardian, William A. Calandra, Esquire
vs.
Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
Patel**

Court of Common Pleas

170300712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY
PURSUANT TO RULE 4009.21**

Provider:

Record Type:

Bensalem Police Department

Miscellaneous

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 07/24/2017

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf
of:
Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:

Litigation Solutions, LLC (412.263.5656)

Brentwood Towne Centre

101 Towne Square Way, Suite 251

Pittsburgh, PA 15227

**COUNSEL LISTING FOR M.B., A MINOR BY HER GUARDIAN, WILLIAM A. CALANDRA, ESQUIRE VS.
ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT CO, LLC, AND YAGNA PATEL**

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Kline, Esquire, Thomas R.	1525 Locust Street 19th Floor Philadelphia, PA 19102 P: 215-772-1000 F: 215-735-0937	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Bensalem Police Department

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: July 24, 2017

Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logal Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Bensalem Police Department
2400 Byberry Road
Bensalem PA 19020
Attention: Records Department

Subject: Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe, Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe

Requested Items:

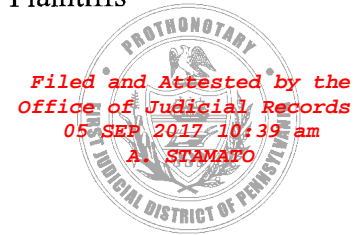
All records pertaining to any reports or any investigation of Daiquan Davis and/or criminal activity, including but not limited to prostitution, solicitation, and human trafficking, at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 from 2012 to the present, including any and all related arrest reports, incident reports, reports of telephone calls made from the Roosevelt Inn, witness statements, handwritten notes, typed reports, Affidavits of Probable Cause, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, and any other documents in your file relating to the Roosevelt Inn and/or Daiquan Davis.

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
 3720 West Chester Pike

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073

Defendants

:
:

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT
HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS
OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION
ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO
ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Le han demandado en corte. Si usted quiere defenderse contra las demandas nominbradas en las paginas siguientes, tiene veinte (20) días a partir de recibir esta demanda y notificación para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted._

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA
PAGAR A UN ABOGADO, ESTA OFICINA PUEDE
PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE
OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS
REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN
HONORARIO.

SERVICIO de REFERENCIA LEGAL
Uno Reading Centro
Filadelfia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
 3720 West Chester Pike

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

 CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073 :
Defendants :

MINOR-PLAINTIFF'S AMENDED COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1200 cases of sex trafficking has been reported for the first six months of 2016 with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014 the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that directly or indirectly benefits financially from such acts is fully deterred through both criminal and civil prosecution.

THE PARTIES

4. Minor-Plaintiff, M.B. was born on September 3, 1999, and is one of the thousands of victims of human trafficking in the United States. During 2013 and 2014, Minor-Plaintiff was exploited and was permitted to be exploited by traffickers of commercial sex acts and those who financially benefitted from her exploitation. Minor-Plaintiff resides in Philadelphia County, Pennsylvania. Minor-Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102. Minor-Plaintiff's guardian for purposes of this civil

action is William A. Calandra, Esquire.

5. Minor-Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Minor-Plaintiff M.B. who incurred injuries and damages starting when she was fourteen (14) years old.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as "Roosevelt Inn LLC"] is a corporation duly organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the "Roosevelt Inn"].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as "Roosevelt Motor Inn, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a corporation duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Defendant Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc. [hereinafter referred to as "Alpha-Centurion Security, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn.

11. Upon information and belief, at all times relevant hereto, Defendant Alpha-Centurion Security, Inc. provided paid for security and related services at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania 19152, incidental to a contractual arrangement as between itself and the owners and operators of the premises: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

12. Defendant Alpha-Centurion Security, Inc. occupied, controlled, patrolled, monitored and assumed responsibility for security of the premises located at the Roosevelt Inn, 630 Roosevelt Boulevard, Philadelphia, PA 19152.

13. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn and assumed responsibility for ensuring the safety and wellbeing of individuals lawfully on the premises, including Minor-Plaintiff M.B.

14. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC, and Alpha-Centurion Security, Inc. regularly conduct business in Philadelphia County.

15. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted individually and/or by and through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

16. At all times material hereto, Alpha-Centurion Security, Inc. acted individually and/or by and through its actual or apparent agents, servants and employees, including but not limited to security guards and is therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

17. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

18. At all material times hereto, Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, was uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn.

19. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur and profited from them.

20. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

21. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor

Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

22. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel received money and financially profited from the commercial sex acts occurring on the premises of the Roosevelt Inn.

24. At all material times hereto, Defendant Alpha-Centurion Security, Inc. received money and financially profited, while having knowledge of the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

25. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3001, et. seq., it is a felony to recruit, entice, solicit, harbor or transport a minor which results in the minor being subjected to sexual servitude.

26. Commencing in 2013, Minor-Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

27. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided, for their own financial benefit, rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts

with Minor-Plaintiff.

28. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn in approximately March 2007 to provide security services.

29. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired to ensure the safety and wellbeing of individuals lawfully on the hotel's premises, the hotel's guests, the hotel's employees, and the hotel's property.

30. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff.

31. It is believed and therefore averred that all of the responsibilities as aforesaid were well within the scope of the contractual responsibilities promised and undertaken by Defendant Alpha-Centurion Security, Inc. as part of its agreement to provide security services on the premises of the Roosevelt Inn.

32. Defendant Alpha-Centurion Security, Inc. assumed responsibility for protecting individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff from foreseeable harm, including commercial sex exploitation and human sex trafficking.

33. Having undertaken responsibilities as aforesaid, Defendant Alpha-Centurion Security owed a duty to Minor-Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Minor-Plaintiff from dangerous people and conditions on the premises.

34. Defendant Alpha-Centurion Security, Inc. provided security services for its own financial benefit, while traffickers used the rooms at the Roosevelt Inn to engage in commercial

sex acts with Minor-Plaintiff.

35. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts.

36. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that rooms and services were being rented or otherwise provided to individuals trafficking Minor-Plaintiff for commercial sex acts, while Alpha-Centurion Security, Inc. had a duty to protect individuals lawfully present at the Roosevelt Inn, like Minor-Plaintiff.

37. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

38. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

39. Minor-Plaintiff's traffickers put up internet advertisements for the purpose of prostituting Minor-Plaintiff.

40. The advertisements would include a fake name for Minor-Plaintiff and a phone number to call.

41. During the phone call, sex for cash was negotiated and the caller "John" would be

informed that Minor-Plaintiff was at the Roosevelt Inn.

42. The “John” who negotiated to have sex for cash with Minor-Plaintiff would then speak to the front desk clerk at the Roosevelt Inn.

43. An individual named “Abdul” would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of “Abdul” is known to Defendants.

44. “Abdul” would then direct the individual to the floor and room where Minor-Plaintiff and her traffickers were staying.

45. “Abdul” was fully aware that Minor-Plaintiff and other underage children were compelled to perform sex for money.

46. Minor-Plaintiff’s traffickers would linger in the halls and on the premises of the Roosevelt Inn.

47. The motel room where Minor-Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

48. Minor-Plaintiff engaged in numerous commercial sex acts “dates” per day.

49. Minor-Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

50. Housekeepers and front desk staff including “Abdul” at the Roosevelt Inn maintained conversations with Minor-Plaintiff and had knowledge that Minor-Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

51. Minor-Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Minor-Plaintiff.

52. Minor-Plaintiff exhibited fear and anxiety while on the premises of the Roosevelt Inn.

53. Minor-Plaintiff's traffickers paid cash for the motel rooms where Minor-Plaintiff engaged in commercial sex acts.

54. Minor-Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Minor-Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

55. Men and other minors frequently entered and left the rooms where Minor-Plaintiff engaged in commercial sex acts.

56. Men stood in the hallways outside of rooms where Minor-Plaintiff was engaged in commercial sex acts.

57. Minor-Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

58. Minor-Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

59. Security guards and/or employees of Defendant Alpha-Centurion Security, Inc. observed Minor-Plaintiff at the Roosevelt Inn in her sexually explicit clothing.

60. Minor-Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

61. Minor-Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash as payment for the motel rooms to the financial profit of all Defendants as owners, operators and managers of the Roosevelt Inn.

62. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual

or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

63. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

64. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel financially profited from the continuation of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

65. Defendant Alpha-Centurion Security, Inc. financially profited from providing security services at the Roosevelt Inn, while having knowledge of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

66. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

67. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of

life's pleasures both in the past and in the future.

68. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

69. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited from providing security services at the Roosevelt Inn, while having knowledge of the human sex trafficking occurring and failing to report, intervene, disrupt or otherwise stop the practice.

70. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

71. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

COUNT I - NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN

TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

72. The averments of Paragraphs 1 through 71 are incorporated herein by reference.

73. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

74. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

75. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

76. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human trafficking and continued profit by not reporting, intervening, disrupting or otherwise stopping the practice.

77. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel,

individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

**COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.**

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

78. The averments of Paragraphs 1 through 77 are incorporated herein by reference.

79. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

80. Defendant Alpha-Centurion Security, Inc. assumed a duty to protect the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, the hotel's employees, and the hotel's guests.

81. Yet, Defendant Alpha-Centurion Security, Inc. harbored Minor-Plaintiff by helping to provide a place of refuge and shelter for commercial sexual exploitation and sex trafficking.

82. Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and sex trafficking occurring at the Roosevelt Inn, but failed to report, intervene, disrupt or otherwise stop the practice.

83. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

84. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

85. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited while allowing human trafficking to occur and continued to profit while not reporting, intervening, disrupting or otherwise stopping the practice.

86. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

87. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III - NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

88. The averments of paragraphs 1 through 87 are incorporated herein by reference.

89. By harboring Minor-Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

90. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

91. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Defendants financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

92. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment

delay.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

93. The averments of paragraphs 1 through 92 are incorporated herein by reference.

94. Having undertaken responsibilities as aforesaid and the provision of security services at the Roosevelt Inn, Defendant Alpha-Centurion Security, Inc. owed a duty to protect the safety and wellbeing of individuals lawfully present at the hotel, the hotel's guests, the hotel's employees, and the hotel's property.

95. Defendant Alpha-Centurion Security, Inc. failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff, although Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and human trafficking occurring at the Roosevelt Inn.

96. Defendant Alpha-Centurion Security, Inc., by and through its agents, ostensible agents, officers, servants, and/or employees, was negligent by:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish post orders at the security posts providing protocols for security personnel to follow in circumstances involving commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;
- f. Failing to prevent entry of unauthorized individuals onto the premises;

- g. Failing to properly and adequately train and provide ongoing training to its security personnel including but not limited to ongoing training involving preventing and responding to commercial sexual activity and human sex trafficking;
- h. Failing to select and/or retain only personnel competent to provide proper and adequate security services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a hotel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Minor-Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;
- u. Failing to adequately monitor activity on video surveillance and promptly react

thereto for the safety of Minor-Plaintiff;

- v. Allowing individuals to come on to the premises for the express purpose of conducting commercial sex acts with Minor-Plaintiff;
- w. Failing to prevent Minor-Plaintiff from being trafficked on the premises; and
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344.

97. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

98. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Defendant Alpha-Centurion Security, Inc. financially profited from providing security services that allowed the existence of human sex trafficking, while not reporting, intervening, disrupting or otherwise stopping the practice.

99. Each of the herein-described tortuous or otherwise culpable acts or omissions by Defendant Alpha-Centurion Security, Inc. increased the likelihood that Minor-Plaintiff would suffer the injuries set forth in this Complaint.

100. Defendant Alpha-Centurion Security, Inc.'s negligence increased the risk of harm to Minor-Plaintiff and was a substantial factor in causing and continuing the harm and damages suffered by Minor-Plaintiff.

101. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

102. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and

against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT V - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. The averments of paragraphs 1 through 102 are incorporated herein by reference.

104. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

105. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

106. The averments of paragraphs 1 through 105 are incorporated herein by reference.

107. Defendant Alpha-Centurion Security, Inc. negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

108. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VII - INTENTIONAL INFLCTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. The averments of paragraphs 1 through 108 are incorporated herein by reference.

110. By harboring Minor-Plaintiff to perform commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

111. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VIII - INTENTIONAL INFLCITION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

112. The averments of paragraphs 1 through 111 are incorporated herein by reference.

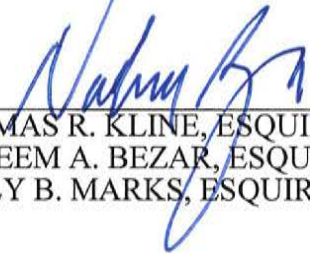
113. By harboring Minor-Plaintiff to perform commercial sex acts, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

114. By having knowledge of commercial sex activity and failing to intervene, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

115. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.
Attorneys for Plaintiff

BY: 


THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

DATED: 9/5/17

VERIFICATION

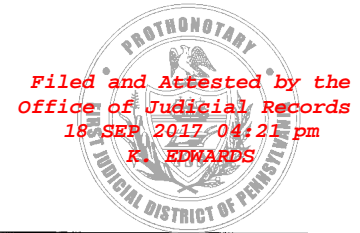
I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter. I hereby verify that I have reviewed the foregoing Minor-Plaintiff's First Amended Complaint, which was prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



WILLIAM A. CALANDRA, ESQUIRE
Guardian for Minor-Plaintiff M.B.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000




M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
 PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY: 
 EMILY B. MARKS, ESQUIRE
 Attorney for Plaintiffs

Date: 9/18/17


CERTIFICATE OF SERVICE

I, Emily B. Marks, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 9/18/17



EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
TO RULE 4009.21**

Plaintiffs intend to serve subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the Subpoenas. If no objection is made, the Subpoenas may be served.

- Philadelphia District Attorney's Office
- Philadelphia Police Department Special Victim's Unit

KLINE & SPECTER, P.C.

BY:


EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs

Date:

8/25/17

CERTIFICATE OF SERVICE

I, Emily B. Marks, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via First Class Mail on the date below:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 06/25/17



EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DISTRICT ATTORNEY'S OFFICE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

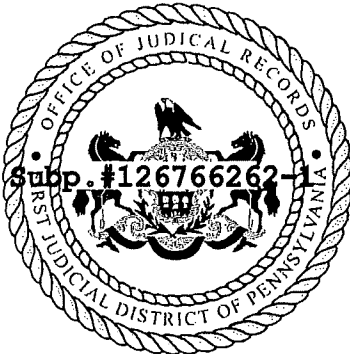
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Marks, Emily B

Date: August 25, 2017

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102



Telephone: 215 772-0524

Supreme Court ID#: 204405

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA DISTRICT ATTORNEY'S OFFICE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

PHILADELPHIA DISTRICT ATTORNEY'S OFFICE

3 South Penn Square
Philadelphia, PA 19107

**Re: Roosevelt Inn
7600 Roosevelt Boulevard
Philadelphia, PA 19152**

AND

Daiquan Davis; Date of Birth: 9/15/1993

Aliases:

"Quan"

"Q"

Dai Quan Davis

Dai-Quan Davis

Daiquan Davis

You are to provide all records pertaining to any criminal cases involving Daiquan Davis, DOB 9/15/1993; and all records involving criminal activity, including but not limited to prostitution, solicitation, and human trafficking, at the Roosevelt Inn from 2012 to the present, including any cases in which Yagna Patel or any other Roosevelt Inn employee was a witness or interviewed, including all related arrest reports, incident reports, reports of telephone calls made from the Roosevelt Inn, witness statements, handwritten notes, typed reports, Affidavits of Probable Cause, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, guilty pleas, dockets, and any other documents in your file relating to the Roosevelt Inn.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILA. POLICE DEPARTMENT SPECIAL VICTIM'S UNIT
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: August 25, 2017

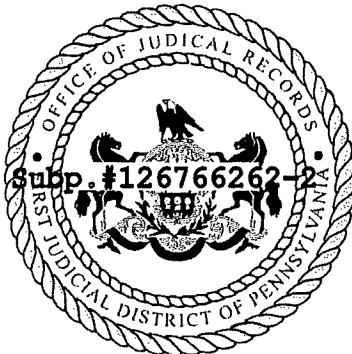
Name: Marks, Emily B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-0524

Supreme Court ID#: 204405

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILA. POLICE DEPARTMENT SPECIAL VICTIM'S UNIT
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

**PHILADELPHIA POLICE DEPARTMENT
SPECIAL VICTIM'S UNIT
300 East Hunting Park Avenue
Philadelphia, PA 19124**

**Re: Roosevelt Inn
7630 Roosevelt Boulevard
Philadelphia, PA 19152**

AND

**Daiquan Davis; Date of Birth: 9/15/1993
Aliases:
"Quan"
"Q"
Dai Quan Davis
Dai-Quan Davis
Daiquan Davis**

You are to provide all records pertaining to any reports or any investigation of Daiquan Davis and/or criminal activity including, but not limited to, prostitution, solicitation, and human trafficking, at the Roosevelt Inn, located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152, from 2012 to the present, including all materials provided to or obtained by SVU from the Roosevelt Inn including all original files and documents taken during the investigation, any and all related arrest reports, incident reports, witness statements, handwritten notes, typed reports, Affidavits of Probable Cause, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, and any other documents in your file relating to the Roosevelt Inn or Daiquan Davis.

TO: **Plaintiff:** YOU ARE HEREBY NOTIFIED TO
FILE A WRITTEN RESPONSE TO THE ENCLOSED
NEW MATTER WITHIN TWENTY (20) DAYS FROM
SERVICE HEREOF OR A **JUDGMENT MAY BE**
ENTERED AGAINST YOU. **25 SEP 2017 04:45 pm**
K. EDWARDS

By: /s/ Grant S. Palmer
Attorney for Defendants Roosevelt Inn, LLC, et al.

BLANK ROME LLP

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doberdick@blankrome.com

*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S
ANSWER TO PLAINTIFF'S AMENDED COMPLAINT
WITH NEW MATTER AND NEW MATTER CROSSCLAIMS**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (collectively “Answering Defendants”), by and through counsel, Blank Rome LLP, hereby file their Answer with New Matter and New Matter Crossclaims to minor Plaintiff M.B.’s (“Plaintiff”) Amended Complaint (“Complaint”) as follows:

1. Denied as stated. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

2. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

3. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

4. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

5. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

6. Denied. Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café is a limited liability company, not a corporation. The remaining averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

7. Admitted in part; denied in part. It is admitted only that Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn is a Pennsylvania corporation. The remaining averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

8. Denied. UFVS Management Company, LLC is a limited liability company, not a corporation. The remaining averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

9. Admitted in part; denied in part. It is admitted only that Yagna Patel was involved in the management of the Roosevelt Inn. The remaining averments contained in this paragraph are denied. Strict proof is demanded at time of trial.

10. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

11. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

12. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

13. Denied. The averments contained in this paragraph are conclusions of law to which

no responsive pleading is required. Strict proof is demanded at time of trial.

14. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

15. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

16. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Said averments are therefore denied. Strict proof is demanded at time of trial.

17. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

18. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

19. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or

omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

20. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

21. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

22. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

23. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

24. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments

contained in this paragraph are conclusions of law to which no responsive pleading is required.

25. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

26. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

27. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

28. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

29. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

30. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

31. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

32. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

33. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. Strict proof is demanded at time of trial.

34. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

35. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

36. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

37. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

38. Denied. Answering Defendants are without knowledge or information sufficient to

form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

39. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

40. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

41. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial.

42. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

43. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

44. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

45. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

46. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

47. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

48. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied

that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

49. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

50. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

51. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

52. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

53. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

54. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

55. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

56. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

57. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied

that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

58. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

59. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

60. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

61. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. It is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries.

62. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

63. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

64. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

65. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

66. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

67. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

68. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

69. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

70. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that Answering Defendants acted outrageously or recklessly at any time material hereto. Further, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

71. Denied. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. Said averments are therefore denied and strict proof thereof is demanded at time of trial. Further, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

**COUNT I – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 PA.C.S.A. § 3001, ET. SEQ.**

**M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT
MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL**

72. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

73. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required.

74. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

75. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial. Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph concerning harms suffered by Plaintiff.

76. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or

omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

77. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that Answering Defendants acted outrageously or recklessly at any time material hereto. Further, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

**COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 Pa.C.S.A. § 3001, ET.SEQ.**

M.B., A MINOR, BY HER GUARDIAN V. ALPHA-CENTURION SECURITY, INC.

78. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

79. – 87. Denied. Paragraphs 79 through 87 are directed to parties other than Answering Defendants and no responsive pleading is required.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT III – NEGLIGENCE

**M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT
MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL**

88. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

89. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

90. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants were negligent at any time material hereto. By way of further response, after reasonable investigation, Answering Defendants are without knowledge or information sufficient to form a belief as to the truthfulness of the averments contained in this paragraph. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

91. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants were negligent at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

92. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN V. ALPHA-CENTURION SECURITY, INC.

93. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

94. – 102. Denied. Paragraphs 94 through 102 are directed to parties other than Answering Defendants and no responsive pleading is required.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT V – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

104. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants were negligent at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

105. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN V. ALPHA-CENTURION SECURITY, INC.

106. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

107. – 108. Denied. Paragraphs 107 through 108 are directed to parties other than Answering Defendants and no responsive pleading is required.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT VII – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B. A MINOR, BY HER GUARDIAN V. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

110. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. By way of further response, it is specifically denied that any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

111. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments in this paragraph are denied. It is specifically denied that Answering Defendants acted outrageously or recklessly at any time material hereto. By way of further response, it is specifically denied that

any acts or omissions on the part of Answering Defendants in any way caused or contributed to Plaintiff's alleged injuries. Strict proof is demanded at time of trial.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

COUNT VIII – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN V. ALPHA-CENTURION SECURITY, INC.

112. Denied. To the extent a response is required, Answering Defendants incorporate by reference the preceding paragraphs as if set forth fully herein.

113. – 115. Denied. Paragraphs 113 through 115 are directed to parties other than Answering Defendants and no responsive pleading is required.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

NEW MATTER

116. Answering Defendants hereby incorporate by reference the preceding paragraphs of this Answer as if fully set forth herein.

117. Plaintiff's Complaint fails to state any claim against Answering Defendants upon which relief may be granted.

118. The alleged incident was not caused by the negligence, negligence per se, recklessness, carelessness, or violation of statute, code, regulation or standard of Answering Defendants.

119. The injuries, losses, or damages suffered by Plaintiff were not proximately caused by Answering Defendants.

120. Plaintiff's claims of damages, which are specifically denied, were not proximately caused by any acts and/or omissions of Answering Defendants, their employees, servants or agents.

121. Any harm or injury suffered by Plaintiff was caused by Plaintiff's own actions and/or inactions.

122. The alleged incident was caused by the negligence, recklessness and/or carelessness of Plaintiff and/or other persons or parties other than Answering Defendants.

123. Plaintiff's actions and/or inactions were negligent and such negligence was a superseding, intervening cause of the alleged accident that bars or limits all claims by Plaintiff.

124. Plaintiff's claims are the result of acts or omissions of other individuals or entities whose acts or omissions constituted intervening and/or superseding causes over which Answering Defendants had no control and which Answering Defendants could not foresee.

125. No conduct, actions, inaction, or omissions on the part of Answering Defendants caused or contributed to Plaintiff's injuries or damages, if any.

126. Answering Defendants were not negligent, careless and/or reckless at any time material hereto.

127. Plaintiff has failed to join all indispensable parties.

128. Plaintiff's Complaint is barred or limited by the appropriate statute of limitations or statute of repose.

129. Plaintiff's Complaint is barred or limited by the doctrine of waiver, estoppel, res judicata and/or laches.

130. Plaintiff's claims are barred or limited by the doctrine of spoliation.

131. Plaintiff's claims are barred or limited by the doctrines of contributory negligence,

comparative negligence, and/or assumption of the risk.

132. Plaintiff's Complaint is barred or limited by Plaintiff's failure to mitigate damages.

133. The injuries and damages complained of by Plaintiff pre-existed or are unrelated to the incident or occurrence which is the subject matter of Plaintiff's Complaint.

134. Plaintiff's claims for damages, if any, are excessive and unsupported and, therefore, must be barred or limited.

135. Answering Defendants owed no duty of care to Plaintiff.

136. To the extent that Answering Defendants owed a duty to Plaintiff, which is denied, Answering Defendants did not breach any duty.

137. A party other than Answering Defendants directed, supervised, and controlled the premises where Plaintiff was allegedly injured.

138. Any acts or omissions of Answering Defendants were not substantial causes of and did not result in the injuries and/or losses alleged by Plaintiff.

139. Plaintiff fails to state a claim under Pennsylvania's Human Trafficking Law, 18 Pa.C.S. § 3001, *et seq.*

140. The alleged causes of action contained in Plaintiff's Complaint are barred by any and all applicable affirmative defenses explicitly set forth in Pa.R.C.P. 1030(a).

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

NEW MATTER CROSSCLAIMS

**ROOSEVELT INN LLC D/B/A ROOSEVELT INN AND ROOSEVELT INN CAFÉ,
ROOSEVELT MOTOR INN, INC., D/B/A ROOSEVELT MOTOR INN, UFVS
MANAGEMENT COMPANY, LLC AND YAGNA PATEL V. DEFENDANT ALPHA-
CENTURION SECURITY, INC.**

141. Answering Defendants hereby incorporate by reference the preceding paragraphs of this Answer as if fully set forth herein.

142. If the allegations in Plaintiff's Complaint are true, it is averred that Defendant Alpha-Centurion Security, Inc., and any subsequently joined defendants and/or additional defendants are alone liable to Plaintiff, with all liability on the part of Answering Defendants being expressly denied.

143. In the alternative, if it is judicially determined that Answering Defendants are liable to Plaintiff, the same being expressly denied, then Defendant Alpha-Centurion Security, Inc., and any subsequently joined defendants and/or additional defendants are jointly and severally liable along with Answering Defendants and/or liable over to Answering Defendants for contribution and/or indemnity.

144. In the event that Plaintiff sustained damages as alleged in the Complaint, said allegations being hereby denied, said damages were a direct result of the acts, omissions, negligence, strict liability, recklessness and/or carelessness of Defendant Alpha-Centurion Security, Inc., and any subsequently joined defendants and/or additional defendants.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

BLANK ROME LLP

/s/ Grant S. Palmer

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: September 25, 2017

VERIFICATION

I, YAGNA PATEL, hereby verify that I am a party to this action and that the facts contained in the foregoing Answer with New Matter and New Matter Crossclaims are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: 9-25-, 2017

By:

Yagna Patel
MANAGER

VERIFICATION

I, Anthony Uzzo, hereby verify that I am authorized to execute this verification on behalf of Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, and the Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, and that the facts contained in the foregoing Answer with New Matter and New Matter Crossclaims are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: September 25, 2017

By:  member/Trustee

VERIFICATION

I, Anthony Uzzo, hereby verify that I am authorized to execute this verification on behalf of UFVS Management Company, LLC, and that the facts contained in the foregoing Answer with New Matter and New Matter Crossclaims are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsifications to authorities.

Dated: September 25, 2017

By:  member/Trustee

CERTIFICATE OF SERVICE

I, Grant S. Palmer, Esquire, hereby certify that, on this 25th day of September 2017, I caused to be served true and correct copies of the foregoing Answer with New Matter and New Matter Crossclaims to be served via the Court's E-Filing system and/or other electronic mail, upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

/s/ Grant S. Palmer
GRANT S. PALMER

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Minor-Plaintiff

Filed and Attested by the
 Office of Judicial Records
 27 SEP 2017 03:07 pm
 K. EDWARDS

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

PRAECIPE TO REINSTATE AMENDED COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Amended Complaint in the above-captioned matter.

KLINE AND SPECTER

Date: 9/26/17

Nadeem A. Bezar
 Attorney for Plaintiff

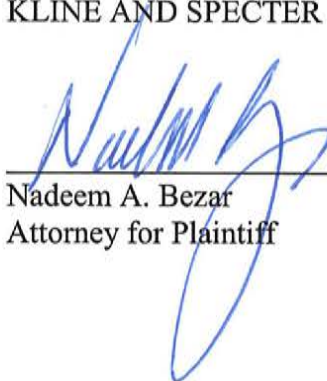
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26^h day of September, 2017 the foregoing Praecipe to Reinstate Amended Complaint was filed and upon acceptance of the Court mailed via Regular Mail and/or electronic mail to the below listed Defendants:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Alpha-Centurion Security, Inc.
c/o Joanna M. Small, President
224 Glendale Road
Havertown, PA 19093

KLINE AND SPECTER



Nadeem A. Bezar
Attorney for Plaintiff

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
c/o Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
287 Bowman Avenue
Purchase, NY 10577

and

YAGNA PATEL
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
3720 West Chester Pike

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073

Defendants

:
:

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT
HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS
OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION
ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO
ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) días a partir de recibir esta demanda y notificación para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted._

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA
PAGAR A UN ABOGADO, ESTA OFICINA PUEDE
PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE
OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS
REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN
HONORARIO.

SERVICIO de REFERENCIA LEGAL
Uno Reading Centro
Filadelfia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
 3720 West Chester Pike

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073 :
Defendants :

MINOR-PLAINTIFF'S AMENDED COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1200 cases of sex trafficking has been reported for the first six months of 2016 with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014 the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that directly or indirectly benefits financially from such acts is fully deterred through both criminal and civil prosecution.

THE PARTIES

4. Minor-Plaintiff, M.B. was born on September 3, 1999, and is one of the thousands of victims of human trafficking in the United States. During 2013 and 2014, Minor-Plaintiff was exploited and was permitted to be exploited by traffickers of commercial sex acts and those who financially benefitted from her exploitation. Minor-Plaintiff resides in Philadelphia County, Pennsylvania. Minor-Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102. Minor-Plaintiff's guardian for purposes of this civil

action is William A. Calandra, Esquire.

5. Minor-Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Minor-Plaintiff M.B. who incurred injuries and damages starting when she was fourteen (14) years old.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as "Roosevelt Inn LLC"] is a corporation duly organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the "Roosevelt Inn"].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as "Roosevelt Motor Inn, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a corporation duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Defendant Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc. [hereinafter referred to as "Alpha-Centurion Security, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn.

11. Upon information and belief, at all times relevant hereto, Defendant Alpha-Centurion Security, Inc. provided paid for security and related services at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania 19152, incidental to a contractual arrangement as between itself and the owners and operators of the premises: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

12. Defendant Alpha-Centurion Security, Inc. occupied, controlled, patrolled, monitored and assumed responsibility for security of the premises located at the Roosevelt Inn, 630 Roosevelt Boulevard, Philadelphia, PA 19152.

13. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn and assumed responsibility for ensuring the safety and wellbeing of individuals lawfully on the premises, including Minor-Plaintiff M.B.

14. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC, and Alpha-Centurion Security, Inc. regularly conduct business in Philadelphia County.

15. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted individually and/or by and through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

16. At all times material hereto, Alpha-Centurion Security, Inc. acted individually and/or by and through its actual or apparent agents, servants and employees, including but not limited to security guards and is therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

17. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

18. At all material times hereto, Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, was uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn.

19. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur and profited from them.

20. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

21. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor

Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

22. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel received money and financially profited from the commercial sex acts occurring on the premises of the Roosevelt Inn.

24. At all material times hereto, Defendant Alpha-Centurion Security, Inc. received money and financially profited, while having knowledge of the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

25. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3001, et. seq., it is a felony to recruit, entice, solicit, harbor or transport a minor which results in the minor being subjected to sexual servitude.

26. Commencing in 2013, Minor-Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

27. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided, for their own financial benefit, rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts

with Minor-Plaintiff.

28. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn in approximately March 2007 to provide security services.

29. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired to ensure the safety and wellbeing of individuals lawfully on the hotel's premises, the hotel's guests, the hotel's employees, and the hotel's property.

30. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff.

31. It is believed and therefore averred that all of the responsibilities as aforesaid were well within the scope of the contractual responsibilities promised and undertaken by Defendant Alpha-Centurion Security, Inc. as part of its agreement to provide security services on the premises of the Roosevelt Inn.

32. Defendant Alpha-Centurion Security, Inc. assumed responsibility for protecting individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff from foreseeable harm, including commercial sex exploitation and human sex trafficking.

33. Having undertaken responsibilities as aforesaid, Defendant Alpha-Centurion Security owed a duty to Minor-Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Minor-Plaintiff from dangerous people and conditions on the premises.

34. Defendant Alpha-Centurion Security, Inc. provided security services for its own financial benefit, while traffickers used the rooms at the Roosevelt Inn to engage in commercial

sex acts with Minor-Plaintiff.

35. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts.

36. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that rooms and services were being rented or otherwise provided to individuals trafficking Minor-Plaintiff for commercial sex acts, while Alpha-Centurion Security, Inc. had a duty to protect individuals lawfully present at the Roosevelt Inn, like Minor-Plaintiff.

37. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

38. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

39. Minor-Plaintiff's traffickers put up internet advertisements for the purpose of prostituting Minor-Plaintiff.

40. The advertisements would include a fake name for Minor-Plaintiff and a phone number to call.

41. During the phone call, sex for cash was negotiated and the caller "John" would be

informed that Minor-Plaintiff was at the Roosevelt Inn.

42. The “John” who negotiated to have sex for cash with Minor-Plaintiff would then speak to the front desk clerk at the Roosevelt Inn.

43. An individual named “Abdul” would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of “Abdul” is known to Defendants.

44. “Abdul” would then direct the individual to the floor and room where Minor-Plaintiff and her traffickers were staying.

45. “Abdul” was fully aware that Minor-Plaintiff and other underage children were compelled to perform sex for money.

46. Minor-Plaintiff’s traffickers would linger in the halls and on the premises of the Roosevelt Inn.

47. The motel room where Minor-Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

48. Minor-Plaintiff engaged in numerous commercial sex acts “dates” per day.

49. Minor-Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

50. Housekeepers and front desk staff including “Abdul” at the Roosevelt Inn maintained conversations with Minor-Plaintiff and had knowledge that Minor-Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

51. Minor-Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Minor-Plaintiff.

52. Minor-Plaintiff exhibited fear and anxiety while on the premises of the Roosevelt Inn.

53. Minor-Plaintiff's traffickers paid cash for the motel rooms where Minor-Plaintiff engaged in commercial sex acts.

54. Minor-Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Minor-Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

55. Men and other minors frequently entered and left the rooms where Minor-Plaintiff engaged in commercial sex acts.

56. Men stood in the hallways outside of rooms where Minor-Plaintiff was engaged in commercial sex acts.

57. Minor-Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

58. Minor-Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

59. Security guards and/or employees of Defendant Alpha-Centurion Security, Inc. observed Minor-Plaintiff at the Roosevelt Inn in her sexually explicit clothing.

60. Minor-Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

61. Minor-Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash as payment for the motel rooms to the financial profit of all Defendants as owners, operators and managers of the Roosevelt Inn.

62. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual

or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

63. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

64. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel financially profited from the continuation of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

65. Defendant Alpha-Centurion Security, Inc. financially profited from providing security services at the Roosevelt Inn, while having knowledge of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

66. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

67. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of

life's pleasures both in the past and in the future.

68. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

69. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited from providing security services at the Roosevelt Inn, while having knowledge of the human sex trafficking occurring and failing to report, intervene, disrupt or otherwise stop the practice.

70. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

71. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

COUNT I - NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN

TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

72. The averments of Paragraphs 1 through 71 are incorporated herein by reference.

73. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

74. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

75. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

76. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human trafficking and continued profit by not reporting, intervening, disrupting or otherwise stopping the practice.

77. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel,

individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

78. The averments of Paragraphs 1 through 77 are incorporated herein by reference.

79. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

80. Defendant Alpha-Centurion Security, Inc. assumed a duty to protect the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, the hotel's employees, and the hotel's guests.

81. Yet, Defendant Alpha-Centurion Security, Inc. harbored Minor-Plaintiff by helping to provide a place of refuge and shelter for commercial sexual exploitation and sex trafficking.

82. Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and sex trafficking occurring at the Roosevelt Inn, but failed to report, intervene, disrupt or otherwise stop the practice.

83. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

84. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

85. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited while allowing human trafficking to occur and continued to profit while not reporting, intervening, disrupting or otherwise stopping the practice.

86. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

87. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III - NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

88. The averments of paragraphs 1 through 87 are incorporated herein by reference.

89. By harboring Minor-Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

90. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

91. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Defendants financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

92. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment

delay.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

93. The averments of paragraphs 1 through 92 are incorporated herein by reference.

94. Having undertaken responsibilities as aforesaid and the provision of security services at the Roosevelt Inn, Defendant Alpha-Centurion Security, Inc. owed a duty to protect the safety and wellbeing of individuals lawfully present at the hotel, the hotel's guests, the hotel's employees, and the hotel's property.

95. Defendant Alpha-Centurion Security, Inc. failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff, although Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and human trafficking occurring at the Roosevelt Inn.

96. Defendant Alpha-Centurion Security, Inc., by and through its agents, ostensible agents, officers, servants, and/or employees, was negligent by:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish post orders at the security posts providing protocols for security personnel to follow in circumstances involving commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;
- f. Failing to prevent entry of unauthorized individuals onto the premises;

- g. Failing to properly and adequately train and provide ongoing training to its security personnel including but not limited to ongoing training involving preventing and responding to commercial sexual activity and human sex trafficking;
- h. Failing to select and/or retain only personnel competent to provide proper and adequate security services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a hotel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Minor-Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;
- u. Failing to adequately monitor activity on video surveillance and promptly react

thereto for the safety of Minor-Plaintiff;

- v. Allowing individuals to come on to the premises for the express purpose of conducting commercial sex acts with Minor-Plaintiff;
- w. Failing to prevent Minor-Plaintiff from being trafficked on the premises; and
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344.

97. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

98. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Defendant Alpha-Centurion Security, Inc. financially profited from providing security services that allowed the existence of human sex trafficking, while not reporting, intervening, disrupting or otherwise stopping the practice.

99. Each of the herein-described tortuous or otherwise culpable acts or omissions by Defendant Alpha-Centurion Security, Inc. increased the likelihood that Minor-Plaintiff would suffer the injuries set forth in this Complaint.

100. Defendant Alpha-Centurion Security, Inc.'s negligence increased the risk of harm to Minor-Plaintiff and was a substantial factor in causing and continuing the harm and damages suffered by Minor-Plaintiff.

101. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

102. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and

against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT V - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. The averments of paragraphs 1 through 102 are incorporated herein by reference.

104. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

105. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

106. The averments of paragraphs 1 through 105 are incorporated herein by reference.

107. Defendant Alpha-Centurion Security, Inc. negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

108. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VII - INTENTIONAL INFLCTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. The averments of paragraphs 1 through 108 are incorporated herein by reference.

110. By harboring Minor-Plaintiff to perform commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

111. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VIII - INTENTIONAL INFLCTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

112. The averments of paragraphs 1 through 111 are incorporated herein by reference.

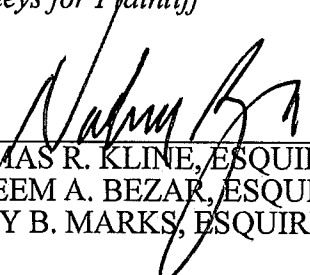
113. By harboring Minor-Plaintiff to perform commercial sex acts, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

114. By having knowledge of commercial sex activity and failing to intervene, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

115. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.
Attorneys for Plaintiff

BY: 

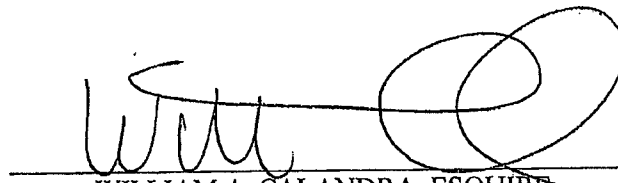
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

DATED: 9/5/17

VERIFICATION

I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter. I hereby verify that I have reviewed the foregoing Minor-Plaintiff's First Amended Complaint, which was prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



WILLIAM A. CALANDRA, ESQUIRE
Guardian for Minor-Plaintiff M.B.

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

Filed and Attested by the
Office of Judicial Records
29 SEP 2017 04:45 pm
D. STEWART

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this ____ day of _____ 2017, upon consideration of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Compel Full and Complete Discovery Responses, and any response thereto, it is hereby **ORDERED** that Minor Plaintiff M.B. shall serve full and complete responses to Defendants' Interrogatories Sets I and II and Requests for Production of Documents Sets I and II within twenty (20) days of the date of this Order or be subject to such sanctions as the Court might impose.

BY THE COURT:

.J

Discovery End Date: October 1, 2018

BLANK ROME LLP

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*Attorneys for Defendants,
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Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

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: COURT OF COMMON PLEAS
: PHILADELPHIA COUNTY
: CIVIL TRIAL DIVISION

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: MARCH TERM, 2017
: NO.: 00712

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: JURY TRIAL DEMANDED
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**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S
MOTION TO COMPEL FULL AND COMPLETE
DISCOVERY RESPONSES DIRECTED TO PLAINTIFF**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively "Defendants"), by their undersigned counsel, hereby file this Motion to

Compel Full and Complete Discovery Responses (the “Motion”) pursuant to Pa. R. Civ. P. 4019 and, in support therefore, state as follows:

1. Plaintiff commenced this civil action on March 10, 2017.
2. On March 18, 2017, Plaintiff was served with Defendants’ First Set of Requests for Production of Documents and First Set of Interrogatories. Then, on June 15, 2017, Plaintiff was served with Defendants’ Second Set of Requests for Production of Documents and Second Set of Interrogatories. *See* Discovery Requests attached collectively as Exhibit “A.”
3. On July 20, 2017, Plaintiff served Defendants with written answers and documents in response to Defendants’ Discovery Requests Sets I and II. *See* Plaintiff’s Discovery Responses attached as Exhibit “B.” However, Plaintiff’s discovery responses were incomplete and insufficiently responsive.
4. In Set I Interrogatories Nos. 6, 30, 33, 34 and 44, Defendants sought information known only to Plaintiff regarding her alleged sex trafficking experiences. More specifically, Defendants requested information related to: a) the dates Plaintiff was at the Roosevelt Inn; b) the circumstances concerning how she was recruited into a human sex trafficking enterprise; c) the facts and contents of any conversations upon which Plaintiff bases her claims that Defendants were aware under age children were being trafficked at the Roosevelt Inn; and d) any medications Plaintiff is currently taking for injuries she alleges she suffered as a result of being trafficked.
5. However, Plaintiff answered these discovery requests as follows:
 - a) Interrogatory No. 6 – When asked when she stayed at the Roosevelt Inn, Plaintiff listed a timeframe of 730 days during which she may have stayed at the Roosevelt Inn. This is deficient as Plaintiff clearly has some knowledge of the

days, weeks, months or seasons and the corresponding years in which she alleges she stayed at the Roosevelt Inn;

- b) Interrogatory No. 30 – After asking Plaintiff to identify the circumstances of how she became involved with the human trafficking enterprise, Plaintiff directed Defendants to the contents of her Complaint, noted that she does not recall exact dates on which she was trafficked and states “[s]ome of this information” can be ascertained from the records she provided. At no time did Plaintiff describe how she was recruited, enticed, solicited, harbored or transported by her traffickers as was requested by this interrogatory;
- c) Interrogatories Nos. 33 and 34 – These interrogatories asked Plaintiff to describe the contents of conversations she had with Roosevelt Inn staff and the facts supporting her claims that Defendants’ employees were aware that trafficking was taking place at the Roosevelt Inn. In response, Plaintiff again directed Defendants to the contents of her Complaint and records from the Department of Human Services (DHS). However, Plaintiff’s Complaint contains mere allegations and the DHS records are devoid of any information to remotely suggest that Roosevelt Inn employees were aware Plaintiff and other minors were being trafficked or that Plaintiff had conversations with Roosevelt Inn employees. Further, Plaintiff is required to supply the requested information and state the contents of the conversations she can recall having with Roosevelt Inn employees;
- d) Interrogatory No. 44 – When asked to list what medications she is currently taking as a result of her alleged trafficking, Plaintiff stated that she “does not

recall all of the medication taken or prescribed” and directs Defendants to her document production. However, the records Plaintiff produced are not up to date. Further, Plaintiff surely can identify what medications, if any, she is currently taking as a result of the injuries she allegedly sustained.

See Exhibits “A” and “B.”

6. Plaintiff’s responses to Set I Interrogatories Nos. 14, 32 and 48 are similarly deficient. Interrogatories Nos. 14, 32 and 48 sought the identities of individuals Plaintiff told and who have information about the allegations contained in her Complaint, including the identity of her family physician. However, Plaintiff’s responses merely stated that her pimps, law enforcement officers, prosecutors and Defendants’ employees have the information requested. Plaintiff’s responses failed to identify her family physician, any family members, friends, acquaintances, teachers or any other individuals or treatment providers who have or to whom she disclosed information regarding her alleged human trafficking experience. Plaintiff’s responses to Interrogatories Nos. 14, 32 and 48 are insufficient. *See Exhibits “A” and “B.”*

7. Likewise, Plaintiff’s responses to Set I Interrogatories Nos. 42, 45 and 46 are deficient. These interrogatories asked Plaintiff to identify the injuries she allegedly suffered, describe Defendants’ conduct that allegedly caused her to suffer these injuries and the amount of bills or any expenses she incurred as a result of her alleged injuries. Plaintiff responded that the information sought by these interrogatories is not currently discoverable because the information is the subject of an expert report. Contrary to Plaintiff’s assertions, this information is discoverable and must be produced. *See Exhibits “A” and “B.”*

8. Plaintiff’s response to Set I Interrogatory No. 54 is similarly deficient. This interrogatory asked Plaintiff to provide information related to any lawsuit in which she provided

testimony. Plaintiff responded “none.” However, in Set II Interrogatories, Plaintiff identified that she was involved in the lawsuit *United States v. Daiquan Davis*, Case No. 15-327, in which she gave evidence against her pimp. Plaintiff’s contradictory responses call into question the thoroughness of her answers. Plaintiff is required to fully respond to this interrogatory and identify any additional lawsuits in which she provided testimony. *See* Exhibits “A” and “B.”

9. Additionally, Plaintiff’s responses to Set II of Defendants’ Interrogatories were also deficient. Set II Interrogatories Nos. 1 and 2 asked Plaintiff to identify all cell phone numbers and carriers for any devices she used during the 2013 through 2014 time period. Plaintiff responded that her pimp gave her a cell phone but does not recall the number or carrier. Plaintiff failed to identify her own carrier or cell phone number despite being asked to do so by this interrogatory. *See* Exhibits “A” and “B.”

10. Finally, Set II Interrogatory 6 sought insurance information relating to any injuries Plaintiff allegedly sustained as a result of human trafficking, including applicable coverage, policy exclusions, whether Plaintiff made any claims under the policy, the nature of the claims and whether any recovery was made under the policy. Plaintiff failed to supply any of this information and merely responded that she has health insurance through Keystone First. Plaintiff’s response to this discovery request is insufficient. *See* Exhibits “A” and “B.”

11. On August 25, 2017, Defendants wrote to Plaintiff advising that many of her discovery responses were deficient. *See* Deficiency Letter attached as Exhibit “C.” In the Deficiency Letter, Defendants specifically noted which of Plaintiff’s discovery responses were deficient and requested that Plaintiff supplement her responses within 14 days. *See Id.* To date, Plaintiff has failed to cure her discovery deficiencies or supplement her responses.

12. On September 13, 2017, Defendants once again wrote Plaintiff asking that she cure the stated deficiencies. Despite Plaintiff's good faith obligation to supplement her discovery responses, Plaintiff's counsel advised that Defendants must file a motion in order to obtain the discovery to which Defendants are entitled. *See* E-mail from Plaintiff's counsel attached as Exhibit "D."

13. The requested discovery concerns matters solely within the knowledge and control of Plaintiff and are essential to Defendants' preparation of the case for trial.

WHEREFORE, Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel respectfully request that this Court grant their Motion and enter an Order pursuant to Pa.R.Civ.P. 4019 compelling Plaintiff to supplement her deficient discovery answers and serve full and complete discovery responses within twenty (20) days or suffer such sanctions as the Court may impose.

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

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(215) 569-5500

Dated: September 29, 2017

BLANK ROME LLP

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Attorney Bar I.D. No.: 200944
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*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

:
:
: COURT OF COMMON PLEAS
:
: PHILADELPHIA COUNTY
:
: CIVIL TRIAL DIVISION
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: MARCH TERM, 2017
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: NO.: 00712
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: JURY TRIAL DEMANDED
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**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S MEMORANDUM OF LAW
IN SUPPORT OF THEIR MOTION TO COMPEL FULL AND COMPLETE
DISCOVERY RESPONSES DIRECTED TO PLAINTIFF**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively "Defendants"), by their undersigned counsel, hereby file this

Memorandum of Law in Support of their Motion to Compel Full and Complete Discovery Responses directed to Plaintiff (the “Motion”).

I. FACTUAL BACKGROUND

Plaintiff commenced this civil action on March 10, 2017, alleging violations of Pennsylvania’s Human Trafficking Law and asserting negligence claims against Defendants and Alpha-Centurion Security, Inc.¹

On March 18, 2017, Plaintiff was served with Defendants’ First Set of Requests for Production of Documents and First Set of Interrogatories. Then, on June 15, 2017, Plaintiff was served with Defendants’ Second Set of Requests for Production of Documents and Second Set of Interrogatories. *See* Discovery Requests attached collectively as Exhibit “A.” On July 20, 2017, Plaintiff supplied written answers and documents in response to Sets I and II of Defendants’ Discovery Requests. *See* Plaintiff’s Discovery Responses attached as Exhibit “B.” However, Plaintiff’s discovery responses were incomplete and insufficiently responsive.

In Set I Interrogatories Nos. 6, 30, 33, 34 and 44, Defendants sought information known only to Plaintiff regarding her alleged sex trafficking experiences. More specifically, Defendants requested information related to: a) the dates Plaintiff was at the Roosevelt Inn; b) the circumstances concerning how she was recruited into a human sex trafficking enterprise; c) the facts and contents of any conversations upon which Plaintiff bases her claims that Defendants were aware under age children were being trafficked at the Roosevelt Inn; and d) any medications Plaintiff is currently taking for injuries she alleges she suffered as a result of being trafficked.

However, Plaintiff answered these discovery requests as follows:

- a) Interrogatory No. 6 – When asked when she stayed at the Roosevelt Inn, Plaintiff listed a timeframe of 730 days during which she may have stayed at the

¹ On September 5, 2017, Plaintiff filed an Amended Complaint naming Alpha-Centurion Security, Inc. as an additional defendant. To date, Alpha-Centurion Security, Inc. has not been properly served.

Roosevelt Inn. This is deficient as Plaintiff clearly has some knowledge of the days, weeks, months or seasons and the corresponding years in which she alleges she stayed at the Roosevelt Inn;

- b) Interrogatory No. 30 – After asking Plaintiff to identify the circumstances of how she became involved with the human trafficking enterprise, Plaintiff directed Defendants to the contents of her Complaint, noted that she does not recall exact dates on which she was trafficked and states “[s]ome of this information” can be ascertained from the records she provided. At no time did Plaintiff describe how she was recruited, enticed, solicited, harbored or transported by her traffickers as was requested by this interrogatory;
- c) Interrogatories Nos. 33 and 34 – These interrogatories asked Plaintiff to describe the contents of conversations she had with Roosevelt Inn staff and the facts supporting her claims that Defendants’ employees were aware that trafficking was taking place at the Roosevelt Inn. In response, Plaintiff again directed Defendants to the contents of her Complaint and records from the Department of Human Services (DHS). However, Plaintiff’s Complaint contains mere allegations and the DHS records are devoid of any information to remotely suggest that Roosevelt Inn employees were aware Plaintiff and other minors were being trafficked or that Plaintiff had conversations with Roosevelt Inn employees. Further, Plaintiff is required to supply the requested information and state the contents of the conversations she can recall having with Roosevelt Inn employees;
- d) Interrogatory No. 44 – When asked to list what medications she is currently taking as a result of her alleged trafficking, Plaintiff stated that she “does not recall all of the medication taken or prescribed” and directs Defendants to her document production. However, the records Plaintiff produced are not up to date. Further, Plaintiff surely can identify what medications, if any, she is currently taking as a result of the injuries she allegedly sustained.

See Exhibits “A” and “B.”

Plaintiff’s responses to Set I Interrogatories Nos. 14, 32 and 48 are similarly deficient. Interrogatories Nos. 14, 32 and 48 sought the identities of individuals Plaintiff told and who have information about the allegations contained in her Complaint, including the identity of her family physician. However, Plaintiff’s responses merely stated that her pimps, law enforcement officers, prosecutors and Defendants’ employees have the information requested. Plaintiff’s responses failed to identify her family physician, any family members, friends, acquaintances, teachers or

any other individuals or treatment providers who have or to whom she disclosed information regarding her alleged human trafficking experience. Plaintiff's responses to Interrogatories Nos. 14, 32 and 48 are insufficient. *See* Exhibits "A" and "B."

Likewise, Plaintiff's responses to Set I Interrogatories Nos. 42, 45 and 46 are deficient. These interrogatories asked Plaintiff to identify the injuries she allegedly suffered, describe Defendants' conduct that allegedly caused her to suffer these injuries and the amount of bills or any expenses she incurred as a result of her alleged injuries. Plaintiff responded that the information sought by these interrogatories is not currently discoverable because the information is the subject of an expert report. Contrary to Plaintiff's assertions, this information is discoverable and must be produced. *See* Exhibits "A" and "B."

Plaintiff's response to Set I Interrogatory No. 54 is similarly deficient. This interrogatory asked Plaintiff to provide information related to any lawsuit in which she provided testimony. Plaintiff responded "none." However, in Set II Interrogatories, Plaintiff identified that she was involved in the lawsuit *United States v. Daiquan Davis*, Case No. 15-327, in which she gave evidence against her pimp. Plaintiff's contradictory responses call into question the thoroughness of her answers. Plaintiff is required to fully respond to this interrogatory and identify any additional lawsuits in which she provided testimony. *See* Exhibits "A" and "B."

Additionally, Plaintiff's responses to Set II of Defendants' Interrogatories were also deficient. Set II Interrogatories Nos. 1 and 2 asked Plaintiff to identify all cell phone numbers and carriers for any devices she used during the 2013 through 2014 time period. Plaintiff responded that her pimp gave her a cell phone but does not recall the number or carrier. Plaintiff failed to identify her own carrier or cell phone number despite being asked to do so by this interrogatory. *See* Exhibits "A" and "B."

Finally, Set II Interrogatory 6 sought insurance information relating to any injuries Plaintiff allegedly sustained as a result of human trafficking, including applicable coverage, policy exclusions, whether Plaintiff made any claims under the policy, the nature of the claims and whether any recovery was made under the policy. Plaintiff failed to supply any of this information and merely responded that she has health insurance through Keystone First. Plaintiff's response to this discovery request is insufficient. *See* Exhibits "A" and "B."

By way of letter dated August 25, 2017, Defendants advised Plaintiff that many of her discovery responses were deficient. *See* Deficiency Letter attached as Exhibit "C." In the Deficiency Letter, Defendants specifically noted which of Plaintiff's discovery responses were deficient and requested that Plaintiff supplement her responses within 14 days. *See Id.* To date, Plaintiff has failed to supplement her responses and cure her deficient responses.

On September 13, 2017, Defendants once again wrote Plaintiff asking that she cure the stated deficiencies. Despite Plaintiff's good faith obligation to supplement her discovery responses, Plaintiff's counsel advised that Defendants must file a motion in order to obtain the discovery to which Defendants are entitled. *See* E-mail from Plaintiff's counsel attached as Exhibit "D."

The requested discovery concerns matters solely within the knowledge and control of Plaintiff and are essential to Defendants' preparation of the case for trial.

II. ARGUMENT

Rule 4006 of the Pennsylvania Rules of Civil Procedure requires a party to provide full and complete answers to interrogatories, in writing and verified, within thirty (30) days after service thereof. Additionally, Rule 4009.12 requires a party to serve written responses to Requests for

Production of Documents served pursuant to Pa. R. Civ. P. 4009.11, as well as the requested documents within thirty (30) days of the request.

Plaintiff has failed to serve full and complete written responses to Sets I and II of Defendants' Interrogatories and Requests for Production of Documents and has failed to produce responsive documents, in flagrant disregard of the Rules of Civil Procedure. Moreover, in response to correspondence from Defendants' counsel, Plaintiff has advised that Defendants must file the instant Motion in order to obtain the discovery to which Defendants are entitled. Therefore, Defendants have no other recourse other than to seek relief from the Court.

III. RELIEF REQUESTED

In light of the above facts, and pursuant to Pa. R. Civ. P. 4019(a)(1), Plaintiff should be compelled by Order of the Court to supplement their prior discovery and produce full and complete written responses, without objection, and responsive documents, or suffer sanctions as the Court may impose.

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

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Dated: September 29, 2017

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Justina L. Byers, Esquire
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*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

:
:
: COURT OF COMMON PLEAS
:
: PHILADELPHIA COUNTY
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: CIVIL TRIAL DIVISION
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: MARCH TERM, 2017
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: NO.: 00712
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: JURY TRIAL DEMANDED
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ATTORNEY CERTIFICATION OF GOOD FAITH

The undersigned counsel for movant hereby certifies and attest that:

☒ a. He or she has had the contacts described below with opposing counsel or unrepresented party regarding discovery matter contained in the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so without Court intervention.

Defendants' counsel has contacted counsel for Plaintiff several times and requested that Plaintiff cure her discovery deficiencies by providing full and complete discovery responses and documents that are the subject of this Motion. Counsel for Plaintiff has failed to cure the deficiencies in its prior discovery response and advised that Defendants may only obtain the discovery they seek by way of a discovery motion.

☐b. He or she was unsuccessful in actually contacting opposing counsel or unrepresented party in an attempt to resolve the discovery dispute(s) despite his or her good faith efforts to do so.

CERTIFIED TO THE COURT BY:

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: September 29, 2017

CERTIFICATE OF SERVICE

I, James J. Quinlan, Esquire, hereby certify that, on this 29th day of September 2017, I caused a true and correct copy of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Compel Full and Complete Discovery Responses to be served via electronic and first class mail upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

/s/ James J. Quinlan
JAMES J. QUINLAN

EXHIBIT A

BLANK ROME LLP

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Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

:
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: COURT OF COMMON PLEAS
:
: PHILADELPHIA COUNTY
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: CIVIL TRIAL DIVISION
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: MARCH TERM, 2017
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: NO.: 00712
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: JURY TRIAL DEMANDED
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**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S FIRST SET OF
INTERROGATORIES DIRECTED TO PLAINTIFF**

Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter
collectively “Defendants”), by and through their attorneys, hereby serve the following
Interrogatories upon Minor Plaintiff, M.B. (“Plaintiff”) to be answered fully and completely, under

oath, within thirty (30) days, pursuant to the Pennsylvania Rules of Civil Procedure. Your answers shall be based upon all information available to you, either directly or through your attorney(s), servant(s), representative(s), or other sources.

DEFINITIONS

The following definitions apply for purposes of these interrogatories:

1. As used herein, “Plaintiff,” means M.B., by her Guardian, William A. Calandra, Esquire, and, unless privilege claimed, each and every attorney, past and present, of Plaintiff.
2. As used herein, “Plaintiff,” “you” and “your” means Plaintiff.
3. As used herein, “Defendants” means Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel, their agents, principals, investigators, consultants, representatives and employees.
4. As used herein, “incident” means the alleged circumstances set forth in Plaintiff’s Complaint concerning Plaintiff’s allegations of underage human sex trafficking.
5. As used herein, the word “person” means natural persons, groups of natural persons acting as individuals, groups of natural persons acting in a collegial capacity (*e.g.*, as a committee, board of directors, etc.), corporations, partnerships, joint ventures and any other incorporated or unincorporated business or social entities, and all administrative committees, hearing boards, and/or decision-making bodies.
6. As used herein, the terms “officers,” “agents,” “employees” and any other such designation means any person serving at any relevant time in any such capacity even though no longer serving in such capacity.

7. As used herein, the term “document” includes every writing and record of every type and description, whether or not in the possession, custody or control of you, your agents, attorneys, or representatives, including, but not limited to, correspondence, memoranda, interoffice communications (including e-mails), written notes, telegrams, minutes of directors or committee meetings, reports, contracts, deeds, options, amendments and addenda to contracts and options, licenses, invoices, ledgers, books of account, journals, vouchers, bank checks, charge slips, account reports, receipts, working papers, charts, graphs, indexes, statistical records, stenographers, notebooks, calendars, appointment books, diaries, time sheets, data sheets, statements, papers, articles, news stories, computer printouts, tapes and records of all types, microfilms, studies, books, pamphlets, schedules, and any preliminary draft of any of these categories of documents, photographic prints, transparencies, moving pictures, voice records and every other device or medium on which or through which information of any type is transmitted, recorded or preserved. The term “document” shall also mean a copy where the original is not in your possession, custody or control and every copy of a document if such copy is not an identical duplicate of the original.

8. As used herein, the term “communications” means any conversation(s), notice(s), transfer(s) or exchange(s) of information, expression(s) of intent, inquiry(ies), or other direction(s), conveyance(s), or receipt(s) of facts or messages, by verbal, written, electronic, telephonic, or any other medium.

9. “Knowledge” includes both firsthand and secondary knowledge (including hearsay knowledge).

10. “State in detail the factual basis for your contention” means you should fully and completely describe every act, event, occurrence, omission, document, or communication of

which you know that supports your contention, as well as identify any witnesses whose testimony you expect will support your position.

11. a. “Identify,” when used with respect to a natural person means to:
- (1) State his or her name;
 - (2) State his or her current or last known residence, address and telephone number;
 - (3) State his or her business address and telephone number; and
- b. “Identify,” when used with respect to a document or report means to state its:
- (1) Date;
 - (2) Title or content identifier;
 - (3) Author; and
 - (4) Current location.
- c. “Identify,” when used with respect to a communication, means to state its:
- (1) Date;
 - (2) Names and titles of persons involved; and
 - (3) The content of the communication.
- d. “Identify,” when used with respect to a transaction, event, incident, incident or occurrence means to:
- (1) State the date thereof;
 - (2) Identify each person involved;
 - (3) Identify the location of the transaction or event.

INSTRUCTIONS

A. In each response to these interrogatories, provide all information in your possession, custody or control. If you are able or willing to provide only part of the information

sought, provide that partial information and specify the reason for your inability or unwillingness to provide the remainder.

B. If any answer to these interrogatories is made upon information and belief, the answering party shall so state, and set forth and identify the sources of such information and belief. If the answering party lacks the knowledge necessary to answer any of these interrogatories, it shall so state.

C. Whenever appropriate to these interrogatories, the singular shall be interpreted as the plural and vice versa; the present tense shall include the past tense and vice versa; and the neuter shall include both the masculine and feminine.

D. If you withhold any information or documents covered by these interrogatories by reason of a claim of privilege or confidentiality, furnish a list identifying each such communication or document, together with the following information: (a) the date of the communication or document; (b) the name of its author, authors or preparers and an identification by employment and title of each person; (c) the name, employment, and title of each person (i) to whom the communication or document was sent or furnished, or (ii) who viewed, received or had custody of the communication or document; (d) a brief description of the communication or document sufficient to permit the Court to adjudicate the validity of the claim; (e) a statement of the basis for the claim; and (f) the paragraph of this request to which the information relates. In case of any communication or document relating in any way to a meeting or to any other conversation, identify all participants in the meeting or conversation.

E. This request for discovery is a continuing one. If, after responding to these interrogatories you obtain or become aware of any additional facts or information responsive to these interrogatories, you are requested to supplement your response.

INTERROGATORIES

1. State the full name, address, and occupation, of the person answering these Interrogatories.

ANSWER:

2. State Plaintiff's full name, current address, social security number, date and place of birth, marital status, names and ages of any children, occupation, place of employment.

ANSWER:

3. Set forth all education you have received including name and address of schools attended.

ANSWER:

4. Set forth the names and addresses of your parents and any siblings.

ANSWER:

5. Identify the names of your teachers.

ANSWER:

6. Identify any and all dates that Plaintiff was at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

ANSWER:

7. Identify any other hotels and/or motels where Plaintiff engaged in any commercial sex acts during the time period alleged in the Complaint as well as the dates of Plaintiff's stay.

ANSWER:

8. Identify any other places that Plaintiff engaged in any commercial sex acts during the time period alleged in the Complaint as well as the dates of Plaintiff's stay.

ANSWER:

9. Identify the names and addresses of all friends, relatives or business associates or other persons with whom Plaintiff resided before, during and after the incident described in the Complaint and provide the dates of such residency.

ANSWER:

10. Identify the names and addresses of all persons with whom Plaintiff had any contact at the Roosevelt Inn and provide a physical description of each such person including age, gender, height, hair color, and any other physical characteristics.

ANSWER:

11. Identify the names and addresses of all persons with whom Plaintiff had any contact at any other hotel/motel where Plaintiff engaged in sex acts during the time period alleged in the Complaint.

ANSWER:

12. Identify the names and addresses of each and every one of Plaintiff's pimps and/or human traffickers involved in the allegations in the Complaint.

ANSWER:

13. Identify the names of each and every pimp that you observed at the Roosevelt Inn.

ANSWER:

14. Identify any person by name and address whom you believe has knowledge or information relating to the allegations in the Complaint.

ANSWER:

15. Identify by name and address each person known to “you” or any of “your” agents, investigators or representatives who had any contact with the Defendants and/or Plaintiff’s pimps or human traffickers relating to the allegations in the Complaint.

ANSWER:

16. Specify all things provided to you to facilitate the trafficking alleged in the Complaint, including but limited to a laptop computer, credit card number, digital camera and/or cell phone.

ANSWER:

17. Prior to 2013, had Plaintiff ever been to the Roosevelt Inn? If so, when, for what purpose and on how many occasions?

ANSWER:

18. When is the first date that you ever engaged in commercial sex acts at the Roosevelt Inn?

ANSWER:

19. How many times total have you entered the Roosevelt Inn?

ANSWER:

20. For each entrance requested to be identified in the preceding Interrogatory, what entrance or exit did you use when entering or leaving the hotel?

ANSWER:

21. When is the last date that you ever engaged in commercial sex acts at the Roosevelt Inn?

ANSWER:

22. What hours of the day did you generally engage in commercial sex acts at the Roosevelt Inn?

ANSWER:

23. Did you meet any Johns outside your room and bring them back to the room? If so, identify where you met them and how they contacted you?

ANSWER:

24. Identify the manner of payment utilized by Plaintiff, Plaintiff's pimps or the "Johns" with whom Plaintiff had contact, for any rooms that were rented at the Roosevelt Inn.

ANSWER:

25. Identify each and every document referring, relating or reflecting any payment for the sex trafficking alleged in the Complaint.

ANSWER:

26. What name was registered with the Roosevelt Inn for the room(s) you occupied?

ANSWER:

27. Identify any and all rooms, including the room number and floor, Plaintiff stayed in at the Roosevelt Inn.

ANSWER:

28. Identify any and all locations, including the room number and floor, Plaintiff stayed in at any other hotel and/or motel during the time period alleged in the Complaint.

ANSWER:

29. Identify by name and address each and every “John” known to “you” or any of “your” agents, investigators or representatives who had any contact with Plaintiff, the Defendants and/or Plaintiff’s pimps or human traffickers.

ANSWER:

30. Describe the circumstances of Plaintiff’s “recruitment, enticement, solicitation, harboring and/or transporting” for the purposes of engaging in commercial sex acts. In your response, include date(s), time(s) and the individual(s) involved in the events and circumstances as alleged in the Complaint.

ANSWER:

31. Identify every employee of the Roosevelt Inn with whom you had a conversation. Your answer(s) should include a detailed description of the substance of the conversations with the individuals so identified as well as the date(s) and time(s) said conversations took place.

ANSWER:

32. Identify each and every individual whom you told that you were being kept at the Roosevelt Inn for the purposes of engaging in commercial sexual acts. Your answer should include the date(s) and time(s) that those discussions took place.

ANSWER:

33. Describe all facts supporting your allegation in the Complaint that “Abdul” was fully aware that Plaintiff and other underage children were compelled to perform sex for money.

ANSWER:

34. State and fully describe the content of any and all conversations you had with “Abdul” as alleged in the Complaint.

ANSWER:

35. State and fully describe the content of any and all conversations you had with any other employees of Roosevelt Inn.

ANSWER:

36. State and fully describe the content of any and all conversations you had with security personnel at Roosevelt Inn.

ANSWER:

37. Describe the visibly aggressive manner in which you allege you were treated by the traffickers.

ANSWER:

38. Identify each and every government agent, police officer, investigator, prosecutor, or law enforcement personnel with whom you have discussed any of the matters alleged in the Complaint.

ANSWER:

39. Have you pursued or filed any criminal charges against any of the traffickers, pimps or johns included in the allegations in the Complaint.

ANSWER:

40. Describe in detail all action you have taken to pursue or press criminal charges against any traffickers, pimps or johns included in the allegations in the Complaint, including all criminal authorities you have communicated with and all charges filed against any persons.

ANSWER:

41. If, at the time of the sex trafficking alleged in the Complaint, you were suffering from, undergoing treatment for, or taking any medications for any injury, illness or condition, state the identity and description of each such injury, illness or condition; any medication you had taken for such injury, illness or condition; and the identity by name, address and telephone number of each physician he consulted regarding such illness, injury or condition.

ANSWER:

42. Identify each and every injury, illness or condition you allege you have suffered as a result of the allegations of the Complaint.

ANSWER:

43. Identify each and every physician, hospital, therapist, counselor or other treatment provider with whom you have treated as a result of the incident set forth in the Complaint. In your response, identify each provider by name, address, telephone number and the date on which the treatment(s) and/or examination(s) were rendered.

ANSWER:

44. Identify any medications you are taking, have taken or were prescribed for any injuries you allege you suffered as a result of the allegations set forth in the Complaint.

ANSWER:

45. Without merely repeating the allegations in your Complaint, state all facts and describe all conduct, if any, upon which you base any contention that each of the Defendants engaged in conduct that caused and/or contributed to matters that are alleged in the Complaint. Specify the particular conduct engaged in by each Defendant and/or their agents, servants or employees.

ANSWER:

46. If you have incurred any losses, bills or expenses in connection with the injuries which you suffered due to the incident in question, and such expenses are not otherwise listed in answer to these interrogatories, set forth the amount of such loss, bill or expense, the service rendered, and the identity of the person or entity who rendered the bill or who was involved with the expense.

ANSWER:

47. If you were undergoing medical care at the time of the alleged incident, state the type of medical care, and give the name, address and telephone number of the provider.

ANSWER:

48. Identify the names and addresses of all physicians, therapists, counselors, mental health providers, substance abuse professionals, hospitals, clinics or other medical providers you have consulted, seen or been treated by in the ten (10) years before and since this incident, and state the approximate number of visits made in those years and the reasons for such visits.

ANSWER:

49. Have you been convicted of any crimes other than minor traffic violations? If so, state the nature of the crime(s) and the date(s) of conviction.

ANSWER:

50. If, at any time, an investigation has been conducted on your behalf with respect to any aspect of the incident in question, identify who conducted the investigation, when it was conducted and why it was made. Produce a copy of any report generated as a result of such an investigation.

ANSWER:

51. Have any statements been obtained from any person, including but not limited to a statement or statements from Defendants, Defendants agents or employees, and Plaintiff's pimps or human traffickers, concerning any matter relating to this action? If so, for each statement indicate the name, address and occupation of the person who made it, the date and time it was obtained, whether written, sound recorded, or oral, and if written or sound recorded, the name and address of the person who has custody of it. Produce a copy of any such statements.

ANSWER:

52. Identify by name and address those persons to whom you have given statements concerning the facts of the alleged incident. Produce a copy of any such statements.

ANSWER:

53. If you have been involved in a lawsuit other than this one, list the name of each such action, the type of action, when it was filed, the court filed in, the attorneys involved, and the disposition of each such lawsuit.

ANSWER:

54. If you have given any testimony in a lawsuit other than this one, list the name of each such action, the type of action, when it was filed, the court filed in, the attorneys involved, and the disposition of each lawsuit.

ANSWER:

55. If you have pressed charges or filed a police report against anyone related to the matters alleged in the Complaint, list the names of the officers who prepared the report and the precinct at which they work. Please produce a copy of any police reports that were filed on your behalf.

ANSWER:

56. If you ever have filed a claim with any insurance company, government or administrative agency concerning any personal injuries suffered by you, state the circumstances of the personal injury claim; when such claim was filed; the insurance company, government or administrative agency involved, and the outcome of each such claim filed by you.

ANSWER:

57. Identify all individuals whom you expect to call as expert witnesses regarding any matter at the trial of this case, and for each such individual:

- (a) Set forth the substance of the facts and opinions to which such expert is expected to testify at trial;
- (b) Set forth the qualifications of each such expert;
- (c) Set forth a summary of the grounds for each such opinion; and
- (d) Identify all documents, including, but not limited to, reports or memoranda reflecting, referring or relating to the facts and opinions to which each such expert is expected to testify at trial.

ANSWER:

58. For each expert witness expected to be called in the trial of this matter, state the following:

- (a) His/her occupation;
- (b) Whether he/she specializes in any particular field, and if so, his/her area or areas of specialization;
- (c) If the expert is employed and/or self-employed, identify the employer, the nature of the employment, the dates of the employment, the title, and the date the expert was retained in this matter; and
- (d) If the expert has ever been certified by any agency, board, or group, please identify such certification, the date of certification, the purpose of such certification, and any and all positions the expert currently holds within the certifying body.

ANSWER:

59. For each expert identified above, set forth his/her qualifications including, but not limited to, the following:

- (a) The schools or training programs that each has attended including the years in attendance and degrees or certificates, etc., received;
- (b) Experience in particular fields of endeavor whether related or unrelated to their areas of specialization, including names and address of employers and the years of such employment; and
- (c) A list of all publications by such persons, including the title of the work, the name of the periodical or book in which it was printed and the date of its publication.

ANSWER:

60. Describe any factual information supplied to each expert including, but not limited to, the following:

- (a) All documents, objects and materials examined by the expert;
- (b) The source of each such document, object or material examined by the expert;
- (c) The date and place of examination of said document, object or material by the expert;
- (d) A description of all photographs, movies, video tapes, plans, buildings, sketches or other documents reviewed by each such expert; and
- (e) Any locations sites or facilities visited by the expert for purposes of preparing his opinions.

ANSWER:

61. For each such person identified in the answer to the previous interrogatory, set forth his/her qualifications, including, but not limited to, the following:

- (a) The schools or training programs that each has attended, including the years in attendance and degrees or certificates, etc., received;
- (b) Experience in particular fields of endeavor whether related or unrelated to their areas of specialization, including names and address of employers and the years of such employment; and
- (c) A list of all publications by such person, including the title of the work, the name of the periodical or book in which it was printed and the date of its publication.

ANSWER:

62. With respect to each expert identified in response to any interrogatory, identify all cases in which that person has testified in the past five (5) years, including the full caption of all cases and the names and addresses of all parties and their attorneys, the courts in which the cases were tried and approximate dates of trial, and list the full captions of all cases in which any expert identified above testified by way of deposition within the last five years.

ANSWER:

63. Identify the manner in which any expert is being compensated in this matter, including:

- (a) The hourly rate;
- (b) The flat rate;
- (c) The flat rates for various services, if they are broken down into costs, depositions, and/or testimony at trial;
- (d) The amount already paid to the expert for his testimony or opinion in this matter; and
- (e) Whether or not you have retained the expert on a contingency basis.

ANSWER:

64. State the name and address and the subject of the testimony of all fact witness(es) that you expect to call at the time of trial.

ANSWER:

65. Identify each and every person who supplied information or who participated in the preparation of Plaintiff's responses to these interrogatories, and with respect to each such person identified, state separately, specifically, completely and in detail, the substance of that person's contribution to each separate response.

ANSWER:

66. Have you withheld any information from your responses to these interrogatories on the basis of attorney/client privilege, the work product doctrine, or any other privilege or doctrine? If so, set forth a description of the information withheld and set forth in detail the facts that form the basis for "your" claim of privilege.

ANSWER:

67. Have you withheld any documents from your response to the Defendants' Requests for Production of Documents Addressed to Plaintiff on the basis of attorney/client privilege, the work product doctrine, or any other privilege or doctrine? If so, identify each document withheld and set forth in detail the fact that form the basis of "your" claim of privilege.

ANSWER:

68. Please identify each and every document Plaintiff intends to introduce or rely upon at the time of trial of this matter.

ANSWER:

BLANK ROME LLP

/s/ Grant S. Palmer

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 18, 2017

CERTIFICATE OF SERVICE

I, Grant S. Palmer, Esquire, hereby certify that, on this 18th day of May 2017, I caused a true and correct copy of Defendants' Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel First Set of Interrogatories Directed to Plaintiff to be served via electronic and first class mail upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

/s/ Grant S. Palmer
GRANT S. PALMER

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
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James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944
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*Attorneys for Defendants,
Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

:
:
: COURT OF COMMON PLEAS
:
: PHILADELPHIA COUNTY
:
: CIVIL TRIAL DIVISION
:
:
: MARCH TERM, 2017
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: NO.: 00712
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: JURY TRIAL DEMANDED
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**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS ADDRESSED TO PLAINTIFF**

Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter
collectively "Defendants"), by and through their attorneys, hereby serve the following request for
production of documents upon Minor Plaintiff, M.B. ("Plaintiff").

All documents requested shall be produced for inspection and copying at the offices of the undersigned within thirty (30) days of the date of service hereof, in accordance with the Pennsylvania Rules of Civil Procedure. In lieu of producing the requested documents at the offices of the undersigned, true and correct copies of all documents may be sent to the offices of the undersigned within time permitted by the Pennsylvania Rules of Civil Procedure. Your answers shall be based upon all information available to you, either directly or through your attorney(s), servant(s), representative(s), or other source.

DEFINITIONS

The following shall apply for purposes of these document requests:

1. “Document” means every writing and record of every type and description, whether or not in the possession, custody or control of you, your agents, attorneys or representatives, including, but not limited to, correspondence, memoranda, interoffice communications, written notes, telegrams, minutes of directors or committee meetings, reports, contracts, deeds, options, amendments and addenda to contracts and options, licenses, bills, invoices, ledgers, books of account, journals, vouchers, bank checks, charge slips, account reports, receipts, working papers, charts, graphs, indexes, statistical records, stenographers’ notebooks, calendars, appointment books, diaries, time sheets, data sheets, statements, papers, articles, news stories, computer printouts, tapes and records of all types, microfilms, studies, books, pamphlets, schedules and any preliminary draft of any of these categories of documents, photographic prints, transparencies, moving pictures, voice records and every other device or medium on which or through which information of any type is transmitted, recorded or preserved.

2. “Communications” means any conversation, notice, transfer or exchange of information, expression of intent, inquiry or other direction, conveyance or receipt of facts or messages, by verbal, written, electronic, telephonic or any other medium.

3. The term “documents” does not include:

- a. any document or portion thereof which contains the mental impressions, conclusions, opinions, memoranda, notes or legal research or legal theories of any attorney for any party of record in this case;
- b. any document or portion thereof which contains the mental impressions, conclusions or opinions respecting the value or it of any claim or defense pertinent to this case, or respecting strategy or tactics, offered by a representative of any party of record in this case other than that party’s attorney; or
- c. the report of any expert who has been retained or specifically employed by the plaintiff in anticipation of litigation preparation for trial and who is not expected to be called as a witness at trial.

4. The phrase “documents relating to” is intended to refer to documents which in whole or in part relate to the designated category information described. Where part of the information in any responsive document is irrelevant, immaterial, or otherwise not included within definition of “documents” as herein above set forth, the balance of material which is or may be relevant should be supplied where appropriate, and other material may be obliterated in any acceptable manner for purposes of copying.

5. As used herein, “Plaintiff,” means M.B., by her Guardian, William A. Calandra Esquire, her heirs, employees, agents, servants, assigns and representatives, past and present, and, unless privilege claimed, each and every attorney, past and present, of Plaintiff.

6. As used herein, “Plaintiff,” “you” and “your” means Plaintiff.

7. As used herein, “Defendants” means Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management

Company, LLC and Yagna Patel, their agents, principals, investigators, consultants, representatives and employees..

8. The “incident” shall refer to the events alleged to have occurred as set forth in Plaintiff’s Complaint.

9. “Relating to,” “related to” and “relate to” shall mean referring to, describing, evidencing, constituting, reflecting, memorializing, supporting, discussing, explaining, evaluating, reviewing, impinging upon or impacting the subject matter of the request.

INSTRUCTIONS

A. Plaintiff shall produce original copies of all requested documents, but also copies of any documents which contain marks or notations not present on the original.

B. Plaintiff shall furnish all known or available documents regardless of whether these documents are possessed directly by you or your agents, employees, representatives, investigators or by your attorneys or their agents, employees, representatives or investigators.

C. In producing documents called for herein, Plaintiff shall segregate the documents so as to identify the numbered request to which such document responds.

D. If any of these documents cannot be produced in full, produce to the next extent possible, and specify in your reasons your inability to produce the remainder, stating whatever information, knowledge or belief you have concerning the unproduced portion.

E. If you withhold any documents covered by the request by reason of a claim of privilege or confidentiality, furnish a list identifying each such document, together with the following information: (a) the date of the document; (b) the name of its author, authors or preparers and an identification by employment and title of each person; (c) the name, employment and title of each person (i) to whom the document was sent or furnished, or (ii) who viewed, received or

had custody of the document; (d) a brief description of the document sufficient to permit the Court to adjudicate the validity of the claim; (e) a statement of the basis for the claim; and (f) the paragraph of this request to which the document relates. In case of any document relating in any way to a meeting or to any other conversation, identify all participants in the meeting or conversation.

F. This is a continuing request for discovery. If, after producing documents, you obtain or become aware of any additional documents responsive to this request, you are requested to supplement your response.

REQUESTS FOR PRODUCTION

1. Any and all documents relating to or reviewed in compiling your answers to Defendants' Interrogatories.

2. A copy of Plaintiff's birth certificate, social security card, driver's license and any other documents that identify Plaintiff's residence.

3. A photograph of Plaintiff taken in 2013 or 2014.

4. Any and all documents identifying and/or related to the dates of Plaintiff's stay at the Roosevelt Inn.

5. Any and all documents related to the Plaintiff's presence at the Roosevelt Inn.

6. Any and all documents identifying and/or related to the places Plaintiff stayed when she was not at the Roosevelt Inn.

7. Any and all documents related to the recruitment, enticement, solicitation, harboring, and/or transporting of Plaintiff to engage in commercial sex acts at the Roosevelt Inn.

8. Any and all documents related to the recruitment, enticement, solicitation, harboring, and/or transporting of Plaintiff to engage in commercial sex acts at any location other than the Roosevelt Inn.

9. Any and all documents related to the allegation that Defendants rented rooms and provided services to the traffickers that forced Plaintiff to engage in commercial sex acts.

10. Any and all documents related to the allegation that Defendants knew or had constructive knowledge that they were providing rooms and services to individuals trafficking Plaintiff for commercial sex acts.

11. Any and all documents related to the allegation that Defendants knew or had constructive knowledge that Plaintiff was being sexually exploited.

12. Any and all documents and/or internet advertisements placed on the internet for the purposes of prostituting Plaintiff.

13. Any and all documents related to the allegation that the “Johns” spoke with the front desk clerk at the Roosevelt Inn.

14. Any and all documents identifying or describing any of Plaintiff’s pimps.

15. Any and all documents identifying or describing any “John” with whom Plaintiff has engaged in commercial sex acts.

16. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives were negligent with respect to the incident.

17. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives observed human sex trafficking within the Roosevelt Inn.

18. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives failed to take any steps to prevent human sex trafficking at the Roosevelt Inn.

19. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

20. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives financially profited from the commercial sex acts that were allegedly occurring on the premises of the Roosevelt Inn.

21. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives caused Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyment of life and loss of life pleasures.

22. Any and all documents, including, but not limited to, all expert reports upon which Plaintiff intends to rely at any deposition or trial of this matter.

23. All documents, demonstrative evidence, and/or exhibits that Plaintiff intends to introduce at any arbitration or trial of this matter.

24. All documents which support any and all claims for damages made by Plaintiff against Defendants.

25. Any and all statements (signed or unsigned) of the parties and/or witnesses, including but not limited to Yagna Patel and Plaintiff, relating to the subject matter of this litigation, including statements of any authorized representatives or agents of Plaintiff or Defendants, descriptions of statements and written accounts of investigation and investigation materials, whether in the possession of Plaintiff or her representatives.

26. Plaintiff's tax returns from 2012 through the present.

27. Police reports and/or reports from any other governmental entity relating to the Plaintiff or any of the allegations of the Complaint.

28. A copy of each writing or transcript including but not limited to, all pleadings and deposition testimony and/or trial testimony arising from any civil action, criminal action and/or action of law concerning the allegations of the Complaint and/or events which gave rise to this litigation.

29. Any release, covenant not to sue or other documents entered into by Plaintiff or which relieves another person, party or entity for liability and/or damages to Plaintiff arising out of the matters giving rise to this litigation.

30. All documents evidencing any Plaintiff's alleged economic damages related to the allegations of the Complaint.

31. Any and all medical or other reports related to Plaintiff's alleged physical injuries, psychological injuries, emotional injuries and/or pain and suffering.

32. Any and all medical reports and records, including hospital and ambulance reports, related to Plaintiff's treatment related to the allegations in the Complaint.

33. Any and all documents showing the receipt of money or anything of value by Plaintiff relating to the allegations of the Complaint.

34. Any and all reports of investigations conducted by any person related to the allegations of the Complaint.

35. All photographs taken or diagrams prepared of Roosevelt Motor Inn or any instrumentality therein, and any and all documents or things depicting the Roosevelt Motor Inn.

36. Any and all documents relating to your allegations of damages in the Complaint.

37. Curriculum vitae for all experts whom you expect to call at trial.

38. Any and all documents identifying and/or relating to individuals who witnessed the allegations of the Complaint.

39. Any and all documents relating to your allegation that Defendants and/or any of their employees, agents or representatives acted intentionally with respect to the incident.

40. Any and all documents relating to any of the allegations set forth in Plaintiff's Complaint.

BLANK ROME LLP

/s/ Grant S. Palmer

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 18, 2017

CERTIFICATE OF SERVICE

I, Grant S. Palmer, Esquire, hereby certify that, on this 18th day of May 2017, I caused a true and correct copy of Defendants' Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel First Set of Requests for Production of Documents Addressed to Plaintiff to be served via electronic and first class mail upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

/s/ Grant S. Palmer
GRANT S. PALMER

EXHIBIT B

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	NOVEMBER TERM, 2016
v.	:	
	:	NO. 0259
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	

**MINOR-PLAINTIFF M.B.'S ANSWERS TO DEFENDANTS
 ROOSEVELT INN LLC, ET AL.'S INTERROGATORIES**

Minor-Plaintiff M.B., by and through her attorneys, Kline & Specter, hereby answers Defendants Roosevelt Inn LLC et al.'s (hereinafter "Roosevelt Inn") Interrogatories as follows. These Interrogatories are being responded to on the basis of information in the possession of Minor-Plaintiff M.B.'s counsel.

1. Minor-Plaintiff M.B. answers these interrogatories by and through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire, and Emily B. Marks, Esquire of Kline & Specter, P.C.
2.
 - a. Name: Madison Beason.
 - b. Current Address: Minor-Plaintiff currently may be contacted through her attorneys.
 - c. Social Security Number: Objection. This Interrogatory is unduly burdensome and not calculated to lead to the discovery of admissible evidence.

- d. Date and Place of Birth: 09/03/99; Philadelphia, PA.
- e. Names and Ages of Any Children: None
- f. Occupation: Minor-Plaintiff is currently a student.
- g. Place of Employment: N/A

3. Upon information and belief, Minor-Plaintiff has attended Sharswood Elementary School, Arthur Street Elementary School, Hazleton Middle School, Pepper Middle School, Harding Middle School, and Wordsworth Academy. Some information regarding the schools attended by Minor-Plaintiff can be found in the records pertaining to Minor-Plaintiff from the following organizations: Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

4.

- a. Mother: Kelly Anne Beason
- b. Father: Robert Beason
- c. Half-Brother: Arther Powel, Jr.
- d. Half-Sisters: Amanda Beason, Gabrielle Beason

5. Minor-Plaintiff does not recall the names of all of her teachers. This information can be ascertained from Minor-Plaintiff's school records, which is not currently in Minor-Plaintiff's possession. Some of Minor-Plaintiff's teachers may be identified in the records pertaining to Minor-Plaintiff from Turning Points for Children Community Umbrella Agency. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

6. See Minor-Plaintiff's Complaint. Minor-Plaintiff does not recall the exact dates she was at the Roosevelt Inn. She was a victim of sex trafficking at the Roosevelt Inn during 2013 to 2014.

7. None.

8. Minor-Plaintiff does not recall the exact addresses of additional locations where she engaged in commercial sex acts. She engaged in commercial sex acts at a house on Comly Street in Philadelphia, PA, and at a house located on Bridge Street in Philadelphia, PA. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

9. Minor-Plaintiff does not recall all the names and addresses of all friends, relatives or business associates or other persons with whom she has resided. Some of the names and address of persons she has resided with may be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

10. See Minor-Plaintiff's Complaint. Minor-Plaintiff does not recall every person that she came into contact with while at the Roosevelt Inn. Minor-Plaintiff was in contact with her traffickers Daiquan Davis and also a man with the first name "Abdul". Minor-Plaintiff does not recall Abdul's last name. Minor-Plaintiff also had contact with the "Johns". Discovery is continuing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

11. Not applicable.

12. See Minor-Plaintiff's Complaint. Minor-Plaintiff was the victim of sex traffickers Daiquan Davis and also "Abdul". Minor-Plaintiff does not know Abdul's last name. Discovery is continuing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

13. See Minor-Plaintiff's Complaint. Minor-Plaintiff does not recall the names of all pimps she observed the Roosevelt Inn. Minor-Plaintiff observed sex traffickers Daiquan Davis and also "Abdul". Minor-Plaintiff does not know Abdul's last name. Discovery is continuing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

14. Minor-Plaintiff is aware of the following people who have knowledge or information relating to the incidents described in her Complaint: Minor-Plaintiff, Daiquan Davis, Abdul (last name unknown), Yagna Patel, law enforcement officers and United States Prosecutors who prosecuted Daiquan Davis. Defendants are in possession of the names and address of their employees and/or agents who have information pertaining to the averments contained in Minor-Plaintiff's Complaint, including security guards, other residents, and hotel employees. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

15. Objection. Defendants would be in possession of information pertaining to who contacted Defendants about the incidents included in Plaintiff's Complaint. Further, Minor-Plaintiff is not in possession of information as to who may have contacted Daiquan Davis and Abdul. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

16. Minor-Plaintiff was given a cell phone and a credit card by her traffickers.

17. No.

18. Minor-Plaintiff does not recall the exact date she first engaged in commercial sex acts at the Roosevelt Inn. Minor-Plaintiff was trafficked at the Roosevelt Inn beginning in approximately the summer of 2013.

19. Objection. Minor-Plaintiff objects to this Interrogatory as vague, because it lacks a temporal scope and the meaning of “enter” is ambiguous. By way of further response, without waiver of objection, see Minor-Plaintiff’s Complaint. Minor-Plaintiff engaged in commercial sex acts as a victim of sex trafficking at the Roosevelt Inn in 2013 and 2014. If “enter” means occupied a room at the Roosevelt Inn or came in through one of the entrances to the Roosevelt Inn, Minor-Plaintiff does not recall how many times she entered the Roosevelt Inn.

20. Minor-Plaintiff used the front door entrance by the front desk, the side door entrance, and the back door entrance.

21. See Minor-Plaintiff’s Complaint. Minor-Plaintiff does not recall the date of the last time she engaged in commercial sex activity at the Roosevelt Inn. Minor-Plaintiff engaged in commercial sex acts as a victim of sex trafficking at the Roosevelt Inn from 2013 and 2014. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

22. Minor-Plaintiff did not engage in commercial sex acts during designated hours of the day. Minor-Plaintiff was “on-call” 24/7 while at the Roosevelt Inn.

23. Yes, Minor-Plaintiff met “Johns” by the front, side, or back entrance of the Roosevelt. The “Johns” contacted Minor-Plaintiff by phone.

24. Minor-Plaintiff does not recall the method of payment used by her traffickers to rent rooms at the Roosevelt Inn. Minor-Plaintiff did witness her traffickers Daiquan Davis and “Abdul” pay for the rooms.

25. Minor-Plaintiff is not currently in possession of any documents responsive to this Interrogatory. Documents relating to payment for sex trafficking would be in the possession of her traffickers Daiquan Davis and “Abdul”; Defendants’ employees and/or agents; and law enforcement. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

26. Minor-Plaintiff does not know the names registered with the Roosevelt Inn for the rooms she occupied. Minor-Plaintiff’s sex traffickers, Daiquan Davis and “Abdul”, would rent the rooms and determine the names used to register the rooms.

27. Minor-Plaintiff does not recall the room numbers or floors of all the rooms that she occupied while at the Roosevelt Inn. Minor-Plaintiff occupied approximately half the rooms at the Roosevelt Inn while she engaged in commercial sex acts at the Roosevelt Inn.

28. Not applicable.

29. Minor-Plaintiff does not recall the names of the “Johns”. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

30. See Minor-Plaintiff’s Complaint. Minor-Plaintiff does not recall the exact dates and times of all the events and circumstances regarding engaging in commercial sex acts at the Roosevelt Inn. Minor-Plaintiff also does not recall the names of all individuals involved in the incidents described in her Complaint. Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the Philadelphia Department of Human Services. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

31. See Minor-Plaintiff’s Complaint. Minor-Plaintiff does not recall each conversation she had with employees of the Roosevelt Inn. Discovery is ongoing and Minor-

Plaintiff reserves the right to supplement this response as discovery continues.

32. Objection. Minor-Plaintiff objects to this Interrogatory as overly broad and unduly burdensome. By way of further response, without waiver of objection, Minor-Plaintiff does not recall each individual with which she discussed her experience as a victim of sex trafficking at the Roosevelt Inn. Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the Philadelphia Department of Human Services and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

33. See Minor-Plaintiff's Complaint. Some of this information can also be ascertained from the records pertaining to Minor-Plaintiff from the Department of Human Services. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

34. See Minor-Plaintiff's Complaint. Minor-Plaintiff does not recall all of the conversations had with "Abdul". Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the Department of Human Services. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

35. See response to Interrogatory No. 31.

36. Minor-Plaintiff does not recall the details of conversations she had with security personnel at the Roosevelt Inn. Minor-Plaintiff does recall that security personnel advised girls engaged in commercial sex activity to put more clothing on when walking in the hallways. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

37. See Minor-Plaintiff's Complaint. Minor-Plaintiff does not recall each incident of

physical abuse she suffered. Beyond verbal name calling and physical handling, Minor-Plaintiff was constantly warned by the traffickers. Discovery is ongoing and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

38. Minor-Plaintiff does not recall the names of the law enforcement personnel with whom she discussed the incidents of sex trafficking she experienced. Minor-Plaintiff did speak with a detective named “Rose” and representatives from the U.S. Attorney’s office.

39. No.

40. See response to Interrogatory No. 39.

41. Minor-Plaintiff does not recall all of the medical treatment she received at the time of the sex trafficking she experienced at the Roosevelt Inn. Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

42. Minor-Plaintiff has suffered physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of enjoyments of life and loss of life’s pleasures. By way of further response, this Interrogatory seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

43. Minor-Plaintiff does not recall all of her treating providers. Some of the information can be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing,

and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

44. Minor-Plaintiff does not recall all of the medication taken or prescribed to her as a result of the emotional, physical, and sexual abuse she suffered as a victim of sex trafficking. Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

45. See Minor-Plaintiff's Complaint. This Interrogatory seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

46. This Interrogatory seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

47. This information can be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

48. Minor-Plaintiff does not recall all of her treating providers from the last ten years. Some of this information can be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery

continues.

49. No.

50. None.

51. Minor-Plaintiff is unaware of statements made.

52. Minor-Plaintiff does not recall all the statements given regarding the incidents described in the Complaint. Minor-Plaintiff does recall having conversations with law enforcement regarding the incidents described in the Complaint.

53. None.

54. None.

55. Unknown at this time. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

56. None.

57. Responses to expert interrogatories and/or expert reports will be produced in accordance with Pa.R.C.P. 4003.5 upon a determination as to the use and identity of expert witnesses and the Case Management deadlines established by the Court.

58. See response to Interrogatory No. 57.

59. See response to Interrogatory No. 57.

60. See response to Interrogatory No. 57.

61. See response to Interrogatory No. 57.

62. See response to Interrogatory No. 57.

63. See response to Interrogatory No. 57.

64. Minor-Plaintiff has not yet identified which fact witnesses she will use at trial.

This information will be provided in accordance with the deadlines established by the Court's

Case Management Order and the Pennsylvania Rules of Civil Procedure.

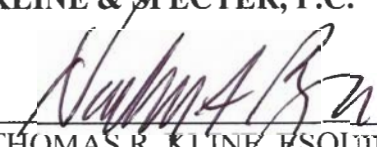
65. Minor-Plaintiff provided information in preparation of responses to these Interrogatories. The information provided can also be ascertained from the records pertaining to Minor-Plaintiff from the following organizations: the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer.

66. No.

67. No.

68. Minor-Plaintiff has not yet identified which documents she will use at trial. This information will be provided in accordance with the deadlines established by the Court's Case Management Order and the Pennsylvania Rules of Civil Procedure.

KLINE & SPECTER, P.C.


THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff

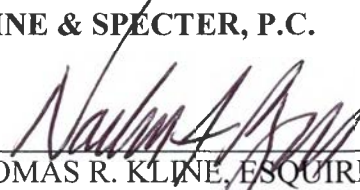
Dated: 7/18/17

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of a true and correct copy of *Minor-Plaintiff M.B.'s Answers to Defendants Roosevelt Inn LLC, et al.'s Interrogatories and Requests for Production of Documents* was made upon all individuals listed below, by email and first-class U.S. mail, postage prepaid on July ^{18th}~~12~~, 2017:

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M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	NOVEMBER TERM, 2016
v.	:	
	:	NO. 0259
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	

**MINOR-PLAINTIFF M.B.'S ANSWERS TO DEFENDANTS ROOSEVELT INN LLC,
 ET AL.'S REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Objection. Minor-Plaintiff objects to this Request to the extent it calls for information protected by attorney-client and/or work product privilege. By way of further response, without waiver of objection, see the following records pertaining to Minor-Plaintiff from the Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Public records pertaining to the criminal prosecution of Daiquan Davis are equally accessible to Defendants.

2. See the records identified in response to Request No. 1. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

3. A search for photographs of Minor-Plaintiff taken in 2013 or 2014 is ongoing and photographs will be produced if and when they are located. Minor-Plaintiff reserves the right to supplement this response as discovery continues.

4. Objection. The term “stay” is vague and unclear. Minor-Plaintiff is not in possession of any responsive documents. This claim involves the sex trafficking of Minor-Plaintiff and the negligent operation of Defendants’ motel. Defendants would be in possession of documents and/or their own security video surveillance pertaining to incidents involving the trafficking of Minor-Plaintiff at the Roosevelt Inn. This information may be contained in records that are in the possession of the United States Attorney’s Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

5. Objection. See response to Request No. 1.

6. Objection. Minor-Plaintiff objects to this Request as overly broad, because it lacks a temporal scope. Further, Minor-Plaintiff also objects to this Request as ambiguous as to the meaning of “stay.” By way of further response, without waiver of objection, see records identified in response to Request No. 1. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

7. Minor-Plaintiff is not in possession of any responsive documents. This claim involves the sex trafficking of Minor-Plaintiff and the negligent operation of Defendants’ motel. Defendants would be in possession of documents and/or their own security video surveillance pertaining to incidents involving the trafficking of Minor-Plaintiff at the Roosevelt Inn. This information may be contained in records that are in the possession of the United States Attorney’s Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

8. Minor-Plaintiff is not currently in possession of any documents responsive to this

Request. Minor-Plaintiff was trafficked only at the Roosevelt Inn.

9. Minor-Plaintiff is not in possession of any responsive documents. This claim involves the sex trafficking of Minor-Plaintiff and the negligent operation of Defendants' motel. Defendants would be in possession of documents and/or their own security video surveillance pertaining to Defendants' rental of rooms services provided to the traffickers that forced Minor-Plaintiff to engage in commercial sex acts. This information may be contained in records that are in the possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

10. Minor-Plaintiff is not in possession of any responsive documents. This claim involves the sex trafficking of Minor-Plaintiff and the negligent operation of Defendants' motel. Defendants would be in possession of documents and/or their own security video surveillance pertaining to Defendants' knowledge or constructive knowledge about Defendants' providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts at the Roosevelt Inn. This information may be contained in records that are in the possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

11. Minor-Plaintiff is not in possession of any responsive documents. This claim involves the sex trafficking of Minor-Plaintiff and the negligent operation of Defendants' motel. Defendants would be in possession of documents and/or their own security video surveillance pertaining to Defendants' knowledge or constructive knowledge that Minor-Plaintiff was being sexually exploited at the Roosevelt Inn. This information may be contained in records that are

in the possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

12. Objection. Minor-Plaintiff objects to this Request to the extent that it seeks documents that are publicly available and equally accessible to Defendants. By way of further response, without waiver of objection, Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Responsive documents may be in possession of the United States Attorney's Office and/or law enforcement agencies. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

13. Minor-Plaintiff is not in possession of any responsive documents. Defendants would be in possession of documents and/or their own security video surveillance related to averments that "Johns" spoke with Defendants' employee and/or the agent who was the front desk clerk at the Roosevelt Inn. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

14. See the Indictment in the matter of the United States of America v. Daiquan Davis, Crime No. 15-327 that is publicly available and equally accessible to Defendants. As it is security footage of Defendants' premises, Defendants would be in possession of the security video surveillance of the Roosevelt Inn. Additional responsive documents may be in possession of the United States Attorney's Office or law enforcement agencies that is equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

15. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. As it is security footage of Defendants' premises, Defendants would be in possession

of the security video surveillance of the Roosevelt Inn. Additional responsive documents may be in possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

16. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Defendants would be in possession of documents and/or their own security video surveillance related to averments that Defendants and/or any of their employees, agents or representatives were negligent with respect to the trafficking incidents involving Minor-Plaintiff at the Roosevelt Inn. Responsive documents may be in possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

17. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Defendants would be in possession of documents and/or their own security video surveillance related to averments that Defendants and/or any of their employees, agents or representatives observed human trafficking with the Roosevelt Inn. Responsive documents may be in possession of the United States Attorney's office and/or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

18. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Defendants would be in possession of documents and/or their own security video surveillance related to observation of human trafficking at the Roosevelt Inn by Defendants and/or any of their employees, agents or representatives. Responsive documents may be in

possession of the United States Attorney's office and/or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

19. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Defendants would be in possession of documents and/or their own security video surveillance related to the failure of Defendants and/or any of their employees, agents or representatives to report to authorities that human sex trafficking was occurring at the Roosevelt Inn. Responsive documents may be in possession of the United States Attorney's office and/or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

20. Minor-Plaintiff is not in possession of any responsive documents. Defendants would be in possession of documents related to the averment that Defendants and/or any of their employees, agents or representatives financially profited from the commercial sex acts that occurred on the premises of the Roosevelt Inn. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

21. The information sought by this Request can be ascertained from the records pertaining to Minor-Plaintiff from Hall Mercer. Records from Joseph J. Peters Institute and additional medical records will be produced when received. By way of further response, this Request seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

22. Objection. The Request seeks information that is not discoverable per Pa. R. Civ. P. 4003.5(a)(3) and is protected by the attorney/work product and/or attorney client privilege. By way of further response, without waiver of objections, reports and curriculum vitae of experts

to be called at trial and evidence to be introduced at trial will be provided in accordance with the Court's Case Management Order and the Pennsylvania Rules of Civil Procedure.

23. See response to Request No. 22.

24. See response to Request No. 21.

25. Minor-Plaintiff objects to this Request to the extent that it calls for information protected by the attorney-client and/or attorney work product privilege. By way of further response, without waiver objection, Minor-Plaintiff is not in possession of any statements as defined by Pa. R. Civ. P. 4003.4. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

26. None.

27. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

28. Objection. Minor-Plaintiff objects to this Request to the extent that it seeks documents that are publicly available and equally accessible to Defendants. By way of further response, without waiver of objection, Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

29. Minor-Plaintiff is not currently in possession of any documents responsive to this Request.

30. See response to Request No. 21.

31. See response to Request No. 1 and No. 21.

32. See response to Request No. 1 and No. 21.

33. Minor-Plaintiff is not currently in possession of any documents responsive to this

Request. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

34. Objection to the extent this Request seeks information protected by the Attorney Work-Product Privilege and also information that is publicly available and equally accessible to Defendants. By way of further response, discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

35. Objection. Minor-Plaintiff objects to this Request to the extent that it seeks documents that are publicly available and equally accessible to Defendants and also are protected by the Attorney Work-Product Privilege. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

36. See response to Request No. 1 and 21.

37. See response to Request No. 22.


38. Defendants would be in possession of documents and/or their own security video surveillance relating to individuals who witnessed the incidents described in Minor-Plaintiff's Complaint. See also documents in the matter of the United States of America v. Daiquan Davis, Crime No. 15-327 that are publicly available and equally accessible to Defendants. Responsive documents may be in possession of the United States Attorney's Office /or law enforcement agencies. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

39. Minor-Plaintiff is not currently in possession of any documents responsive to this Request. Defendants would be in possession of documents and/or their own security video surveillance related to intentional acts by Defendants and/or any of their employees, agents or representatives involving the sex trafficking of Minor-Plaintiff at the Roosevelt Inn. Responsive

documents may be in possession of the United States Attorney's office and/or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

40. See documents and security video surveillance identified in these responses.

KLINE & SPECTER, P.C.



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NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff

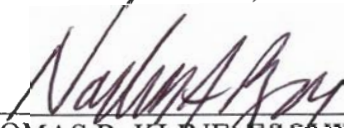
Dated: 7/18/17

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of a true and correct copy of *Minor-Plaintiff M.B. 's Answers to Defendants Roosevelt Inn LLC, et al. 's Requests for Production of Documents* was made upon all individuals listed below, by email and first-class U.S. mail, postage prepaid on July __, 2017:

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KLINE & SPECTER, P.C.*Attorneys for Minor-Plaintiff*

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 EMILY B. MARKS, ESQUIRE/204405
 1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	NOVEMBER TERM, 2016
v.	:	
	:	NO. 0259
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	

**MINOR-PLAINTIFF M.B.'S ANSWERS TO DEFENDANTS
 ROOSEVELT INN LLC, ET AL.'S INTERROGATORIES (SET II)**

Minor-Plaintiff M.B., by and through her attorneys, Kline & Specter, hereby answers Defendants Roosevelt Inn LLC et al.'s (hereinafter "Roosevelt Inn") Interrogatories as follows. These Interrogatories are being responded to on the basis of information in the possession of Minor-Plaintiff M.B.'s counsel.

1. Minor-Plaintiff was given a cell phone to use by her trafficker Daiquan Davis while she was engaging in commercial sex activity, but she does not recall the telephone number or carrier. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

2. See the response to Interrogatory No. 1. By way of further response, Minor-Plaintiff does not recall the make and model of the cell phone, and she does not have knowledge or information regarding who currently possess and/or has control over the phone and the current location of the phone.

3. None. Minor-Plaintiff is a full-time high school student.

4. Yes, Minor-Plaintiff has suffered an impairment of her earning capacity as a result of being a victim of sex trafficking at the Roosevelt Inn. By way of further response, this Interrogatory seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

5. Yes, this Interrogatory seeks information that will be subject of an expert report to be provided in accordance with the Case Management deadlines in this case.

6. Yes, Minor-Plaintiff has health insurance through Keystone First. Information in Minor-Plaintiff's possession regarding her insurance coverage can be found in the records pertaining to Minor-Plaintiff from Turning Points for Children Community Umbrella Agency. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

7. Objection. Minor-Plaintiff objects to this Interrogatory, because it seeks information protected by attorney-client privilege, and it is not calculated to lead to the discovery of admissible evidence.

8. This information may be ascertained from records that are in the possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants.

a. Minor-Plaintiff's father's name is Robert Beason, and he resides at 3479 Emerald Street, Philadelphia, PA 19134. Minor-Plaintiff does not have knowledge of any conversations between her father and Daiquan Davis.

b. Minor-Plaintiff does not recall the address of foster homes where she lived. Some of this information can be ascertained from the records pertaining to Minor-

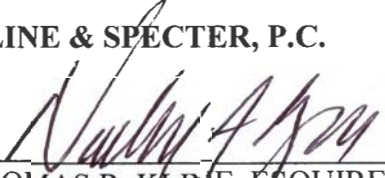
Plaintiff from the following organizations: Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

- c. See response to Interrogatory 8b.
 - d. See response to Interrogatory 8b.
 - e. Minor-Plaintiff does not recall the address of the house on Comly Street where Minor-Plaintiff was prostituted.
 - f. Minor-Plaintiff recalls that the Comly Street house was owned by the father of a man named “Paul”. Minor-Plaintiff does not recall Paul’s last name or the name of “Paul’s” father.
 - g. Minor-Plaintiff does not have knowledge or information of all of the individuals who lived at the Comly Street house. Minor-Plaintiff was aware of “Paul” and his girlfriend living at the house.
 - h. Minor-Plaintiff does not recall all the individuals with which she had conversations at the Comly Street house. Minor-Plaintiff did have conversations with the “Johns” at the Comly Street house.
 - i. Minor-Plaintiff does not have knowledge or information of all of the individuals who were at the Comly Street house. Minor-Plaintiff was aware of Paul, his girlfriend, and the “Johns”.
 - j. Minor-Plaintiff recalls that “Paul” was paid a fee in exchange for using the house on Comly Street.
9. Minor-Plaintiff used an email address owned by her trafficker Daiquan Davis

while she was a victim of sex trafficking at the Roosevelt Inn.

10. Minor-Plaintiff did not own or use any social media accounts during the time period of the incidents described in her Complaint.

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff

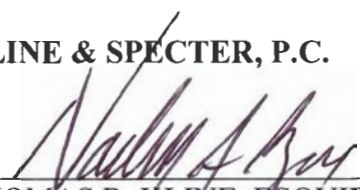
Dated: 

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of a true and correct copy of *Minor-Plaintiff M.B. 's Answers to Defendants Roosevelt Inn LLC, et al. 's Interrogatories (Set II)* was made upon all individuals listed below, by email and first-class U.S. mail, postage prepaid on July __, 2017:

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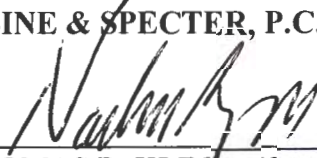
M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	NOVEMBER TERM, 2016
v.	:	
	:	NO. 0259
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	

**MINOR-PLAINTIFF M.B.'S ANSWERS TO DEFENDANTS ROOSEVELT INN LLC,
ET AL.'S REQUESTS FOR PRODUCTION OF DOCUMENTS (SET II)**

1. See the records pertaining to Minor-Plaintiff from Philadelphia Department of Human Services, Turning Points for Children Community Umbrella Agency, and Pennsylvania Hospital Hall-Mercer.

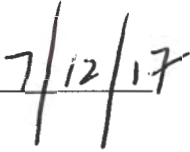
2. Minor-Plaintiff is not in possession of any responsive documents. This information may be contained in records that are in the possession of the United States Attorney's Office or law enforcement agencies that are equally accessible to Defendants. Discovery is ongoing, and Minor-Plaintiff reserves the right to supplement this response as discovery continues.

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff

Dated: _____

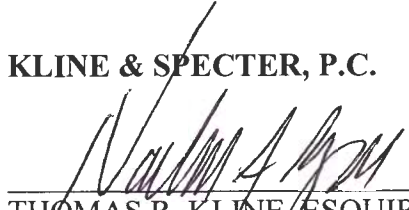


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KLINE & SPECTER, P.C.



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NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Minor-Plaintiff

VERIFICATION

I, M.B., hereby state that I am the Plaintiff in the within matter, and as such verify that the statements made in the foregoing Plaintiff's Responses to Defendant's Interrogatories and Request for Production of Documents are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

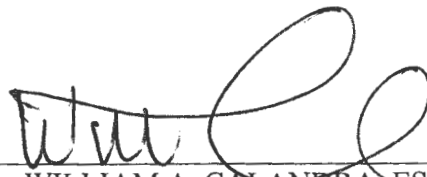


M.B. - PLAINTIFF

VERIFICATION

I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter, and I am authorized to take this Verification on behalf of the Minor-Plaintiff, M.B. I hereby verify that I have reviewed the foregoing Minor-Plaintiff, M.B.'s Answers to Defendants Roosevelt Inn LLC, et al.'s Interrogatories and Request for Production of Documents, which were prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'W. Calandra', is written over a horizontal line.

WILLIAM A. CALANDRA, ESQUIRE
Guardian

EXHIBIT C



Phone: (215) 569-5430
Fax: (215) 832-5430
Email: quinlan@blankrome.com

August 25, 2017

VIA ELECTRONIC & FIRST CLASS MAIL

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

**Re: *M.B. v. Roosevelt Inn LLC et al.*, Philadelphia Court of Common Pleas,
March Term, 2017**

Dear Counsel:

I write regarding Plaintiff's responses to the Defendants' Interrogatories Set I and Interrogatories Set II, which we received on July 20, 2017. As described in detail below, Plaintiff's responses are deficient in numerous respects and I request that you promptly supplement Plaintiff's responses to the following:

INTERROGATORIES SET I:

Interrogatory No. 6: This Interrogatory requested that Plaintiff identify "any" dates that she was at the Roosevelt Inn. Plaintiff responded that she does not recall the exact dates she was at the Roosevelt but that she was a victim of human trafficking at the Roosevelt Inn during 2013 to 2014. Plaintiff failed to identify a single date, month or season in which she alleges she was at the Roosevelt Inn. Instead, Plaintiff listed a timeframe of 730 days during which she may have stayed at the Roosevelt Inn. This is clearly insufficient and merely reiterates Plaintiff's allegations in the Complaint. Clearly Plaintiff has some knowledge of the days, weeks, months or seasons and the corresponding years in which she alleges she stayed at the Roosevelt Inn. Please supplement this response.

Interrogatory No. 14: This interrogatory asked Plaintiff to identify "any person" with knowledge or information related to the allegations in the Complaint. Plaintiff responded that she is aware that Daiquan Davis, Abdul (last name unknown), law enforcement officers, prosecutors, security guards, residents, defendants and defendants' employees have this information. Plaintiff has failed to identify any physicians, mental health providers, social workers, friends or family with



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knowledge or information related to these allegations. Plaintiff must identify by name and address of all persons with knowledge, or to whom she communicated information concerning the allegations set forth in her complaint.

Interrogatory No. 30: This interrogatory asks Plaintiff to describe the circumstances of her “recruitment, enticement, [and] solicitation” into the human trafficking enterprise alleged in her Complaint and to describe how she was “harbor[ed] and/or transport[ed]” while she was being trafficked. Plaintiff’s response directed Defendants to the contents of her Complaint, noted that she does not recall the exact dates she was trafficked and that “[s]ome of this information” can be ascertained from the records she provided. Plaintiff’s answer to this interrogatory is non-responsive. At no time and in no document has Plaintiff identified how she was recruited, enticed or solicited by her human traffickers. Further, Plaintiff has utterly failed to describe how she was harbored at or transported to the locations where she engaged in the commercial sex acts alleged throughout her Complaint. Plaintiff’s response to this interrogatory is insufficient and must be supplemented.

Interrogatory No. 32: Similar to Interrogatory No. 14, Plaintiff was asked to identify each and every individual she told that she was being kept at the Roosevelt Inn to engage in commercial sex acts. Plaintiff’s response states that this interrogatory is overly broad, she does not recall everyone she told and that some of this information is contained in the documents from the Philadelphia Department of Human Services and Pennsylvania Hospital Hall-Mercer. However, the records Plaintiff references fail to identify family members, friends, acquaintances, teachers, employers or other non-healthcare/social service employees to whom she disclosed that she was being kept at the Roosevelt Inn to engage in sex acts. Again, Plaintiff’s response to this interrogatory is deficient and must be supplemented.

Interrogatory No. 33: This interrogatory asks Plaintiff to identify all facts to support her allegations that “Abdul” was fully aware that “Plaintiff and other underage children were compelled to perform sex acts for money.” Plaintiff’s response directs Defendants to the contents of the Complaint and records from the Department of Human Services. Plaintiff’s Complaint contains mere allegations without facts in support thereof. Further, the records from the Department of Human Services is devoid of any information to remotely suggest that Abdul (an alleged employee of the Roosevelt Inn) was aware that Plaintiff and other underage children were being compelled to perform sex acts for money at the Roosevelt Inn. In fact, the only Abdul referenced in the records produced by Plaintiff is the individual whom she alleges was her other human trafficker. Plaintiff’s response to this interrogatory is insufficient and falls short of what is required under the Rules of Civil Procedure.

Interrogatory No. 34: Related to Interrogatory No. 33, this interrogatory asks Plaintiff to describe the contents of any conversation she had with Abdul as alleged in the Complaint, whom Plaintiff alleges represented himself as an employee of Defendants. Plaintiff’s responded that she



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Page 3

“does not recall all of the conversations had with ‘Abdul.’” Plaintiff is required to state the contents of conversations that she can recall having with “Abdul.” Further, contrary to Plaintiff’s assertions, the only Abdul referenced in the records produced by Plaintiff is the individual whom she alleges was her other human trafficker. Plaintiff’s response to this interrogatory is once again insufficient and falls short of what is required from her under the Rules of Civil Procedure.

Interrogatory No. 42: This interrogatory asks Plaintiff to identify each and every illness, injury or condition allegedly suffered as a result of the human trafficking allegations contained in her Complaint. Plaintiff’s response is that she “suffered physical harm, [and] a sexually transmitted disease,” and that this interrogatory seeks information that is the subject of an expert report. Plaintiff has failed to identify exactly what physical harm she suffered or exactly what sexually transmitted disease she contracted. While an expert report may offer opinions on the alleged harm Plaintiff suffered, the Rules of Civil Procedure do not permit Plaintiff withhold facts identifying exactly what sexually transmitted disease she contracted or what physical harm she suffered. This information must be disclosed and Plaintiff is required to supplement her discovery responses.

Interrogatory No. 44: This interrogatory includes a request for Plaintiff to identify any medications she is currently taking for injuries she allegedly suffered resulting from the allegations in her Complaint. Plaintiff’s response is that she “does not recall all of the medication taken or prescribed” and directs Defendants to the documents Plaintiff produced. However, the records Plaintiff provided are not up to date. Further, Plaintiff surely can identify what medications, if any, she is currently taking as result of the injuries she allegedly sustained. Again, Plaintiff is required to supplement her response to this interrogatory.

Interrogatory No. 45: In this interrogatory, Plaintiff was asked to, without merely restating the allegations in the Complaint, identify all facts and describe Defendants’ conduct that she alleges caused/contributed to the matters alleged in the Complaint. Directly contrary to the requirements of this request, Plaintiff states “See Minor-Plaintiff’s Complaint.” And, much like Interrogatory 42 above, states that this interrogatory seeks information that is the subject of an expert report. Again, while an expert may render opinions on facts contained in the record, the Rules of Civil Procedure do not permit Plaintiff to withhold those same facts from the record. This information must be disclosed and Plaintiff is required to supplement her response to this interrogatory.

Interrogatory No. 46: This interrogatory asks Plaintiff to disclose the amounts of any bills or expenses she incurred as a result of the allegations set forth in her Complaint. Like her answers to Interrogatories 42 and 45, Plaintiff responds that this information is subject of an expert report. The Rules of Civil Procedure do not permit Plaintiff to withhold discoverable information such as medical bills simply because an expert may use that information in his or her report. This information must be produced and Plaintiff is required to supplement this response.



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Interrogatory No. 48: This interrogatory asks Plaintiff to identify the names and addresses of “all physicians, therapists, counselors, mental health providers, substance abuse professionals, hospitals, clinics or other medical providers” she has seen in the ten years before her incident. Included in this interrogatory is a request for Plaintiff to identify her family physicians. Plaintiff’s response to this interrogatory was that she “does not recall all of her treating providers from the last ten years. Some of this information can be ascertained from the records” that were produced. However, the documents that were produced do not identify Plaintiff’s family physicians. This information must be disclosed and Plaintiff is required to supplement her discovery responses.

Interrogatory No. 54: This request asks Plaintiff to provide information related to any lawsuit in which she provided testimony. Plaintiff’s response to this interrogatory was “none.” However, in Plaintiff’s Response to Defendants’ Interrogatories Set II, Plaintiff identified that she was involved in the lawsuit *United States of America v. Daiquan Davis*, Case No. 15-327, in which she gave evidence against her pimp. Plaintiff’s response to Defendants’ Interrogatories Set II directly contradicts the response she provided to Interrogatory No. 54. Plaintiff is required to fully respond to this interrogatory and identify any additional lawsuits in which she provided testimony.

INTERROGATORIES SET II:

Interrogatories Nos. 1 and 2: These interrogatories ask Plaintiff to identify “any and all cellular telephone numbers and cellular telephone carriers” for devices she used during the 2013-2014 time period. Plaintiff responded that she was given a cell phone by Daiquan Davis but does not recall the telephone number or carrier. However, this interrogatory requires Plaintiff to identify telephone numbers and telephone carriers for “any and all devices” she was using during this time period. At a minimum, this request requires Plaintiff to provide her own personal telephone number and to identify her personal telephone carrier. None of this information was provided and Plaintiff must supplement this response.

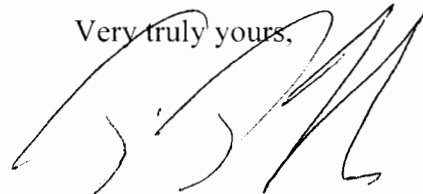
Interrogatory No. 6: Interrogatory No. 6 asks Plaintiff to identify information regarding insurance coverage applicable to the injuries Plaintiff allegedly sustained as a result of human trafficking, including whether any exclusions apply to Plaintiff’s policy, whether Plaintiff made any claims under the policy, the nature of said claims, the total amount and date of any recovery. Plaintiff has failed to provide any of this information and merely responded that she has health insurance through Keystone First. Plaintiff is required to provide full and complete responses to this interrogatory and must supplement her response.



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Please provide the requested information and documents within 14 days so that motion practice can be avoided. I look forward to receipt of your prompt and complete responses.

Very truly yours,



JAMES J. QUINLAN

JJQ/deo

EXHIBIT D

Oberdick, Daniel

From: Bezar, Nadeem <Nadeem.Bezar@KlineSpecter.com>
Sent: Wednesday, September 13, 2017 5:10 PM
To: Quinlan, James J.
Cc: Marks, Emily; Palmer, Grant; Oberdick, Daniel
Subject: Re: MB v Roosevelt

No. You should not expect to receive responses by the end of this week.

I don't agree that everything you identified was a deficiency. So if you want everything supplemented as requested, you will have to file a Motion.

Nadeem A Bezar
Kline & Specter, PC
1525 Locust Street
Philadelphia, Pa 19102
215-772-0522
Nadeem.Bezar@klinespecter.com
www.klinespecter.com

Sent from my iPhone

> On Sep 13, 2017, at 4:46 PM, Quinlan, James J. <Quinlan@BlankRome.com> wrote:

>

> Hi Nadeem:

>

> We gave your client two weeks to cure various discovery deficiencies. See the attached and below. The two weeks have passed and I have not heard from you.

>

> I would prefer not to have to file a motion. Can I expect supplemental responses curing the stated deficiencies before the end of the week?

>

> Thank you,

> Jim

>

> James J. Quinlan | Blank Rome LLP

> One Logan Square | 130 N. 18th Street | Philadelphia 19103

> Phone: 215.569.5430 | Fax: 215.832.5430 | Cell: 267.243.9331

> Email: Quinlan@BlankRome.com

>

>

> -----Original Message-----

> From: Quinlan, James J.

> Sent: Tuesday, August 29, 2017 10:51 AM

> To: Nadeem.Bezar@KlineSpecter.com

> Subject: MB v Roosevelt

>

> Nadeem-

> Please see the attached- also being sent by regular mail.

>

> Thank you,

> Jim

>

>

>

>

>

> This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.

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> <Roosevelt Inn - Discovery Deficiency Letter to P_s Counsel.PDF>

>

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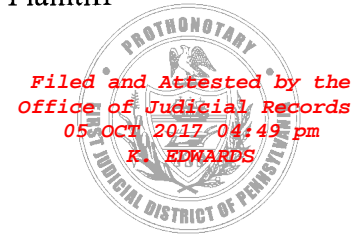
> Sent from my iPhone

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Plaintiff



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
	:	
	:	
Defendants	:	

ENTRY OF APPEARANCE AS CO-COUNSEL FOR PLAINTIFF

TO THE PROTHONOTARY:

Kindly enter my appearance as co-counsel for Minor-Plaintiff M.B. in the above-captioned matter.



KYLE B. NOCHO, ESQUIRE

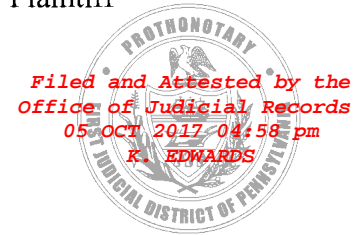
Dated: October 5, 2017

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiff



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**MINOR-PLAINTIFF M.B.'S REPLY TO NEW MATTER OF DEFENDANTS
 ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC.,
UFVS MANAGEMENT AND YAGNA PATEL**

Minor-Plaintiff, by and through counsel, Kline & Specter, P.C., hereby replies to New Matter of Defendants, Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel (collectively, "Defendants") as follows:

116. This is an incorporation paragraph to which no response is required.

117. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

118. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

119. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

120. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

121. Denied. It is specifically denied that any harm or injury suffered by Minor-Plaintiff was caused by Minor-Plaintiff's own actions and/or inactions. Strict proof of Defendants' allegations is hereby demanded.

122. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

123. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendant's allegations is hereby demanded.

124. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

125. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

126. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

127. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

128. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

129. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

130. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

131. Denied. This paragraph is a conclusion of law to which no response is required.
To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

132. Denied. This paragraph is a conclusion of law to which no response is required.
To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

133. Denied. This paragraph is a conclusion of law to which no response is required.
To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof of Defendants' allegations is hereby demanded.

134. Denied. This paragraph is a conclusion of law to which no response is required.
To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

135. Denied. This paragraph is a conclusion of law to which no response is required.
Strict proof is hereby demanded.

136. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

137. Denied. This paragraph is a conclusion of law to which no response is required. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the same are denied. Strict proof of Defendants' allegations is hereby demanded.

138. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

139. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

140. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants and demands compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

NEW MATTER CROSSCLAIMS


**ROOSEVELT INN LLC D/B/A ROOSEVELT INN AND ROOSEVELT INN CAFÉ,
ROOSEVELT MOTOR INN, INC., D/B/A ROOSEVELT MOTOR INN, UFVS
MANAGEMENT COMPANY, LLC AND YAGNA PATEL V. DEFENDANT ALPHA-
CENTURION SECURITY, INC.**

141. This is an incorporation paragraph to which no response is required.

142. – 144. Paragraphs 142 through 144 are directed to a party other than Plaintiff, and no response is required.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants and demands compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.

A handwritten signature in cursive script, appearing to read "Kyle Nocho", is written over a horizontal line.


THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE

Dated: 10/5/2017

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for the Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff M.B.'s Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: 10/5/2017

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of October, 2017, the foregoing Minor-Plaintiff's Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel was electronically filed and served upon acceptance electronically the below listed counsel:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

KLINE & SPECTER, P.C.

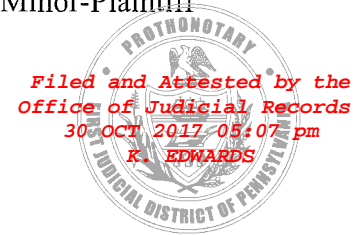
BY: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Minor-Plaintiff



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

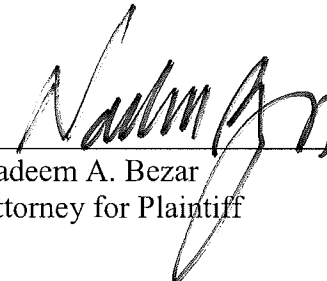
PRAECIPE TO REINSTATE AMENDED COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Amended Complaint in the above-captioned matter.

KLINE AND SPECTER

Date: 10/30/17


 Nadeem A. Bezar
 Attorney for Plaintiff

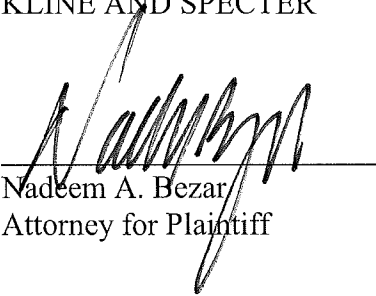
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of October, **2017** the foregoing Praecipe to Reinstate Amended Complaint was filed and upon acceptance of the Court mailed via Regular Mail and/or electronic mail to the below listed Defendants:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Alpha-Centurion Security, Inc.
c/o Joanna M. Small, President
224 Glendale Road
Havertown, PA 19093

KLINE AND SPECTER



Nadeem A. Bezar
Attorney for Plaintiff

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
c/o Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
*d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE*
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
287 Bowman Avenue
Purchase, NY 10577

and

YAGNA PATEL
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
3720 West Chester Pike

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073

Defendants

:
:

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT
HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS
OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION
ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO
ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) días a partir de recibir esta demanda y notificación para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA
PAGAR A UN ABOGADO, ESTA OFICINA PUEDE
PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE
OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS
REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN
HONORARIO.

SERVICIO de REFERENCIA LEGAL
Uno Reading Centro
Filadelfia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

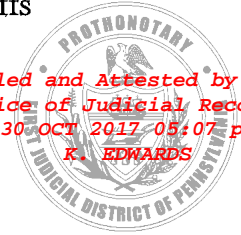
KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs

Filed and Attested by the
 Office of Judicial Records
 30 OCT 2017 05:07 pm
 K. EDWARDS



M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
 3720 West Chester Pike

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

 CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073 :
Defendants :

MINOR-PLAINTIFF'S AMENDED COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1200 cases of sex trafficking has been reported for the first six months of 2016 with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014 the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that directly or indirectly benefits financially from such acts is fully deterred through both criminal and civil prosecution.

THE PARTIES

4. Minor-Plaintiff, M.B. was born on September 3, 1999, and is one of the thousands of victims of human trafficking in the United States. During 2013 and 2014, Minor-Plaintiff was exploited and was permitted to be exploited by traffickers of commercial sex acts and those who financially benefitted from her exploitation. Minor-Plaintiff resides in Philadelphia County, Pennsylvania. Minor-Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102. Minor-Plaintiff's guardian for purposes of this civil

action is William A. Calandra, Esquire.

5. Minor-Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Minor-Plaintiff M.B. who incurred injuries and damages starting when she was fourteen (14) years old.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as "Roosevelt Inn LLC"] is a corporation duly organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the "Roosevelt Inn"].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as "Roosevelt Motor Inn, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a corporation duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Defendant Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc. [hereinafter referred to as "Alpha-Centurion Security, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn.

11. Upon information and belief, at all times relevant hereto, Defendant Alpha-Centurion Security, Inc. provided paid for security and related services at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania 19152, incidental to a contractual arrangement as between itself and the owners and operators of the premises: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

12. Defendant Alpha-Centurion Security, Inc. occupied, controlled, patrolled, monitored and assumed responsibility for security of the premises located at the Roosevelt Inn, 630 Roosevelt Boulevard, Philadelphia, PA 19152.

13. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn and assumed responsibility for ensuring the safety and wellbeing of individuals lawfully on the premises, including Minor-Plaintiff M.B.

14. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC, and Alpha-Centurion Security, Inc. regularly conduct business in Philadelphia County.

15. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted individually and/or by and through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

16. At all times material hereto, Alpha-Centurion Security, Inc. acted individually and/or by and through its actual or apparent agents, servants and employees, including but not limited to security guards and is therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

17. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

18. At all material times hereto, Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, was uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn.

19. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur and profited from them.

20. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

21. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor

Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

22. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel received money and financially profited from the commercial sex acts occurring on the premises of the Roosevelt Inn.

24. At all material times hereto, Defendant Alpha-Centurion Security, Inc. received money and financially profited, while having knowledge of the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

25. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3001, et. seq., it is a felony to recruit, entice, solicit, harbor or transport a minor which results in the minor being subjected to sexual servitude.

26. Commencing in 2013, Minor-Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

27. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided, for their own financial benefit, rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts

with Minor-Plaintiff.

28. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn in approximately March 2007 to provide security services.

29. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired to ensure the safety and wellbeing of individuals lawfully on the hotel's premises, the hotel's guests, the hotel's employees, and the hotel's property.

30. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff.

31. It is believed and therefore averred that all of the responsibilities as aforesaid were well within the scope of the contractual responsibilities promised and undertaken by Defendant Alpha-Centurion Security, Inc. as part of its agreement to provide security services on the premises of the Roosevelt Inn.

32. Defendant Alpha-Centurion Security, Inc. assumed responsibility for protecting individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff from foreseeable harm, including commercial sex exploitation and human sex trafficking.

33. Having undertaken responsibilities as aforesaid, Defendant Alpha-Centurion Security owed a duty to Minor-Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Minor-Plaintiff from dangerous people and conditions on the premises.

34. Defendant Alpha-Centurion Security, Inc. provided security services for its own financial benefit, while traffickers used the rooms at the Roosevelt Inn to engage in commercial

sex acts with Minor-Plaintiff.

35. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts.

36. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that rooms and services were being rented or otherwise provided to individuals trafficking Minor-Plaintiff for commercial sex acts, while Alpha-Centurion Security, Inc. had a duty to protect individuals lawfully present at the Roosevelt Inn, like Minor-Plaintiff.

37. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

38. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

39. Minor-Plaintiff's traffickers put up internet advertisements for the purpose of prostituting Minor-Plaintiff.

40. The advertisements would include a fake name for Minor-Plaintiff and a phone number to call.

41. During the phone call, sex for cash was negotiated and the caller "John" would be

informed that Minor-Plaintiff was at the Roosevelt Inn.

42. The “John” who negotiated to have sex for cash with Minor-Plaintiff would then speak to the front desk clerk at the Roosevelt Inn.

43. An individual named “Abdul” would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of “Abdul” is known to Defendants.

44. “Abdul” would then direct the individual to the floor and room where Minor-Plaintiff and her traffickers were staying.

45. “Abdul” was fully aware that Minor-Plaintiff and other underage children were compelled to perform sex for money.

46. Minor-Plaintiff’s traffickers would linger in the halls and on the premises of the Roosevelt Inn.

47. The motel room where Minor-Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

48. Minor-Plaintiff engaged in numerous commercial sex acts “dates” per day.

49. Minor-Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

50. Housekeepers and front desk staff including “Abdul” at the Roosevelt Inn maintained conversations with Minor-Plaintiff and had knowledge that Minor-Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

51. Minor-Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Minor-Plaintiff.

52. Minor-Plaintiff exhibited fear and anxiety while on the premises of the Roosevelt Inn.

53. Minor-Plaintiff's traffickers paid cash for the motel rooms where Minor-Plaintiff engaged in commercial sex acts.

54. Minor-Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Minor-Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

55. Men and other minors frequently entered and left the rooms where Minor-Plaintiff engaged in commercial sex acts.

56. Men stood in the hallways outside of rooms where Minor-Plaintiff was engaged in commercial sex acts.

57. Minor-Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

58. Minor-Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

59. Security guards and/or employees of Defendant Alpha-Centurion Security, Inc. observed Minor-Plaintiff at the Roosevelt Inn in her sexually explicit clothing.

60. Minor-Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

61. Minor-Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash as payment for the motel rooms to the financial profit of all Defendants as owners, operators and managers of the Roosevelt Inn.

62. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual

or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

63. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

64. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel financially profited from the continuation of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

65. Defendant Alpha-Centurion Security, Inc. financially profited from providing security services at the Roosevelt Inn, while having knowledge of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

66. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

67. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of

life's pleasures both in the past and in the future.

68. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

69. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited from providing security services at the Roosevelt Inn, while having knowledge of the human sex trafficking occurring and failing to report, intervene, disrupt or otherwise stop the practice.

70. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

71. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

COUNT I - NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN

TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

72. The averments of Paragraphs 1 through 71 are incorporated herein by reference.

73. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

74. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

75. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

76. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human trafficking and continued profit by not reporting, intervening, disrupting or otherwise stopping the practice.

77. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel,

individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

78. The averments of Paragraphs 1 through 77 are incorporated herein by reference.

79. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

80. Defendant Alpha-Centurion Security, Inc. assumed a duty to protect the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, the hotel's employees, and the hotel's guests.

81. Yet, Defendant Alpha-Centurion Security, Inc. harbored Minor-Plaintiff by helping to provide a place of refuge and shelter for commercial sexual exploitation and sex trafficking.

82. Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and sex trafficking occurring at the Roosevelt Inn, but failed to report, intervene, disrupt or otherwise stop the practice.

83. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

84. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

85. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited while allowing human trafficking to occur and continued to profit while not reporting, intervening, disrupting or otherwise stopping the practice.

86. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

87. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III - NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

88. The averments of paragraphs 1 through 87 are incorporated herein by reference.

89. By harboring Minor-Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

90. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

91. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Defendants financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

92. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment

delay.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

93. The averments of paragraphs 1 through 92 are incorporated herein by reference.

94. Having undertaken responsibilities as aforesaid and the provision of security services at the Roosevelt Inn, Defendant Alpha-Centurion Security, Inc. owed a duty to protect the safety and wellbeing of individuals lawfully present at the hotel, the hotel's guests, the hotel's employees, and the hotel's property.

95. Defendant Alpha-Centurion Security, Inc. failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff, although Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and human trafficking occurring at the Roosevelt Inn.

96. Defendant Alpha-Centurion Security, Inc., by and through its agents, ostensible agents, officers, servants, and/or employees, was negligent by:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish post orders at the security posts providing protocols for security personnel to follow in circumstances involving commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;
- f. Failing to prevent entry of unauthorized individuals onto the premises;

- g. Failing to properly and adequately train and provide ongoing training to its security personnel including but not limited to ongoing training involving preventing and responding to commercial sexual activity and human sex trafficking;
- h. Failing to select and/or retain only personnel competent to provide proper and adequate security services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a hotel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Minor-Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;
- u. Failing to adequately monitor activity on video surveillance and promptly react

thereto for the safety of Minor-Plaintiff;

- v. Allowing individuals to come on to the premises for the express purpose of conducting commercial sex acts with Minor-Plaintiff;
- w. Failing to prevent Minor-Plaintiff from being trafficked on the premises; and
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344.

97. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

98. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Defendant Alpha-Centurion Security, Inc. financially profited from providing security services that allowed the existence of human sex trafficking, while not reporting, intervening, disrupting or otherwise stopping the practice.

99. Each of the herein-described tortuous or otherwise culpable acts or omissions by Defendant Alpha-Centurion Security, Inc. increased the likelihood that Minor-Plaintiff would suffer the injuries set forth in this Complaint.

100. Defendant Alpha-Centurion Security, Inc.'s negligence increased the risk of harm to Minor-Plaintiff and was a substantial factor in causing and continuing the harm and damages suffered by Minor-Plaintiff.

101. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

102. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and

against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT V - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. The averments of paragraphs 1 through 102 are incorporated herein by reference.

104. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

105. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

106. The averments of paragraphs 1 through 105 are incorporated herein by reference.

107. Defendant Alpha-Centurion Security, Inc. negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

108. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VII - INTENTIONAL INFLCTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. The averments of paragraphs 1 through 108 are incorporated herein by reference.

110. By harboring Minor-Plaintiff to perform commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

111. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VIII - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

112. The averments of paragraphs 1 through 111 are incorporated herein by reference.

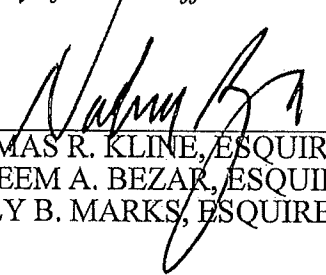
113. By harboring Minor-Plaintiff to perform commercial sex acts, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

114. By having knowledge of commercial sex activity and failing to intervene, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

115. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.
Attorneys for Plaintiff

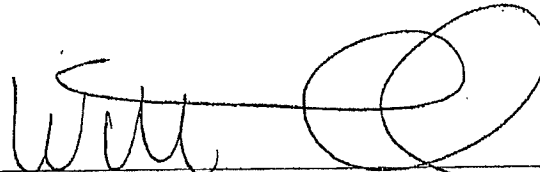
BY: 
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

DATED: 9/5/17

VERIFICATION

I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter. I hereby verify that I have reviewed the foregoing Minor-Plaintiff's First Amended Complaint, which was prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



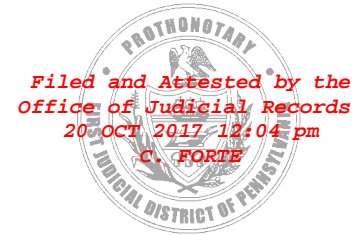
WILLIAM A. CALANDRA, ESQUIRE
Guardian for Minor-Plaintiff M.B.

KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
	:	
Defendants	:	

OBJECTIONS TO SUBPOENA PURSUANT TO Pa.R.C.P. 4009.21

Plaintiff M.B, by her Guardian, William Calandra, Esq., by and through counsel, Kline & Specter, P.C., hereby objects to Defendants' proposed Subpoenas that are attached to these objections for the following reasons:

1. This lawsuit arises from injuries Plaintiff sustained as a victim of sex trafficking at Defendants' motel.
2. A Complaint in this matter was filed on March 10, 2017, and on September 5, 2017, Plaintiffs filed an Amended Complaint.
3. On October 6, 2017, the Roosevelt Inn Defendants issued a Notice of Intent to Serve a Subpoena to produce documents and things, addressed to a total of twenty (20) providers.

4. Included among the proposed Subpoenas are three (3) proposed Subpoenas addressed to members of Plaintiff M.B.'s immediate family, including her mother, father and brother who are not parties to this lawsuit.

5. The three Subpoenas to which Plaintiff objects are addressed to M.B.'s father, R.B., incorrectly identified on the Subpoena as "Dr." R.B.; M.B.'s mother, K.B. and M.B.'s brother, A.P. See Defendants' Notice of Intent with proposed Subpoenas to R.B., K.B. and A.P., attached as Exhibit "A".

6. Each of the Subpoenas directed to Plaintiff's mother, father and brother contains the identical language below:

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.

7. The foregoing information sought from Plaintiff's immediate family members is beyond the scope of discovery, pursuant to Pa. R.C.P. 4011 which provides, in pertinent part:

Rule 4011: Limitation of scope of discovery:

No discovery, including discovery of electronically stored information, shall be permitted which:

(a) is sought in bad faith;

(b) would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent or any person or party;

...

(e) would require the making of an unreasonable investigation by the deponent or any party or witness.

8. Here, Defendants' proposed Subpoenas directed to Plaintiff's parents and brother are in violation of Rule 4011.

9. First, Plaintiff's parents and brother are not parties to this action.

10. Second, these Subpoenas to Plaintiff's immediate family would serve only to harass, annoy and cause a burden to Plaintiff's family.

11. Third, the Subpoenas are unclear, unreasonably vague and overbroad, and Plaintiffs object for this reason also.

12. Accordingly, Plaintiffs object to Defendants' proposed Subpoenas.

13. Pursuant to Pa. R.C.P. 4009.21(c), any party may object to the subpoena by filing of record written objections and serving a copy of the objections upon every other party to the action.

14. If objections are received by the party intending to serve the subpoena prior to its service, the subpoena shall not be served. Pa. R.C.P. 4009.21(d)(1).

15. For all the above reasons, Plaintiffs object to Defendants' proposed Subpoenas directed to Plaintiff's parents and brother, R.B., K.B. and A.P., attached as Exhibit "A".

WHEREFORE, Plaintiffs file this Objection in accordance with Pa. R.C.P. 4009.21.

Respectfully submitted,

KLINE & SPECTER, P.C.

BY:



NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
Attorneys for Plaintiffs

Date: 10/20/17

VERIFICATION

I, EMILY B. MARKS, ESQUIRE, hereby state that I am the attorney for the Plaintiffs in this matter and hereby verify that the statements made in the foregoing Plaintiffs' Objections to Subpoena pursuant to Pa. R.C.P. 4009.21 are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



EMILY B. MARKS, ESQUIRE
Attorney for Plaintiffs

Dated: _____

10/20/17

CERTIFICATE OF SERVICE

I, Emily B. Marks, Esquire, attorney for Plaintiffs, do hereby certify that a true and correct copy of Plaintiffs' Objections to Subpoena pursuant to Pa. R.C.P. 4009.21 was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

I do hereby certify that a true and correct copy of the above Plaintiffs' Objections to Subpoena pursuant to Pa.R.C.P. 4009.21 was served by First Class Mail on the following Defendant on the below date:

Alpha-Centurion Security, Inc.
c/o Joanna M. Small, President
224 Glendale Road
Havertown, PA 19093

I do hereby certify that a true and correct copy of the above Plaintiffs' Objections to Subpoena pursuant to Pa.R.C.P. 4009.21 was served by facsimile on the following on the below date:

Litigation Solutions, LLC
Brentwood Towne Center
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227
Phone: 412-253-1091 Fax: 412-226-5054

KLINE & SPECTER, P.C.



EMILY B. MARKS, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
Attorney for Plaintiffs

Date

10/20/17

EXHIBIT A

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire
 vs.
 Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
 Patel

Court of Common Pleas
 March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
 RULE 4009.21**

Provider:	Record Type:
Warren G. Harding Middle School	Scholastic
Wordsworth Academy	Scholastic
Hazleton Elementary Middle School	Scholastic
George W. Sharswood Elementary School	Scholastic
Arthur Street Elementary School	Scholastic
A.P.	Miscellaneous
K.B.	Miscellaneous
R.B.	Miscellaneous
A Second Chance Inc. - Kinship Care	Medical
The Villa - Public Health Management Corporation	Medical
David Abel	Medical
Joseph J. Peters Institute	Medical
David Abel	Medical
The Bridge Therapeutic Center at Fox Chase	Medical
Lois Harrold	Medical
Lois Harrold	Medical
Y-HEP Health Center	Medical
Patricia H. Morgan MSN CRNP	Medical
Pennsylvania Hospital - Hall-Mercer Community Mental Health	Medical
Pepper George Middle School	Scholastic

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
 of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
 Defense

If you have any questions regarding this matter, please contact:
 Litigation Solutions, LLC (412.263.5656)
 Brentwood Towne Centre
 101 Towne Square Way, Suite 251
 Pittsburgh, PA 15227



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. R.B. _____
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

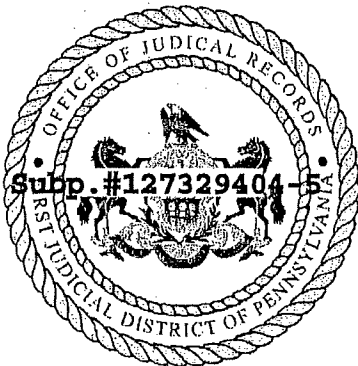
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

R.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: K.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

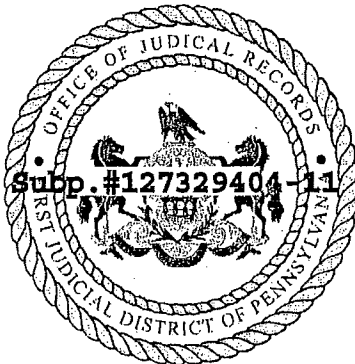
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

K.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A.P.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

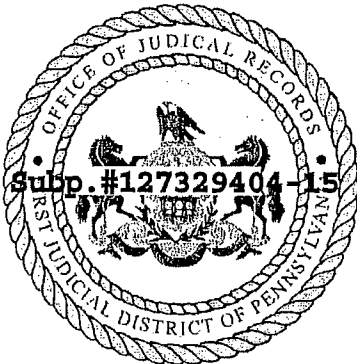
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A.P.

[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.

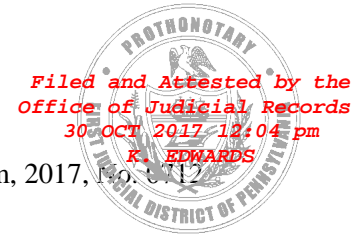
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Court of Common Pleas
Calandra, Esquire

vs.

Roosevelt Inn LLC, Roosevelt Motor Inn,
Inc., UFVS Management Co, LLC, and
Yagna Patel

Case Number: March Term, 2017, No. 0712



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 10/27/2017

Litigation Solutions, LLC on behalf of

Justina Byers, Esquire

Attorney for the Defendant

CC:
Justina Byers, Esquire
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire
vs.
Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
Patel

Court of Common Pleas
March Term, 2017, No. 0712

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21

Provider:

Bensalem Police Department

Record Type:

Miscellaneous

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

**COUNSEL LISTING FOR M.B., A MINOR BY HER GUARDIAN, WILLIAM A. CALANDRA, ESQUIRE VS. ROOSEVELT INN LLC,
ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT CO, LLC, AND YAGNA PATEL**

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Kline, Esquire, Thomas R.	1525 Locust Street 19th Floor Philadelphia, PA 19102 P: 215-772-1000 F: 215-735-0937	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Bensalem Police Department

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

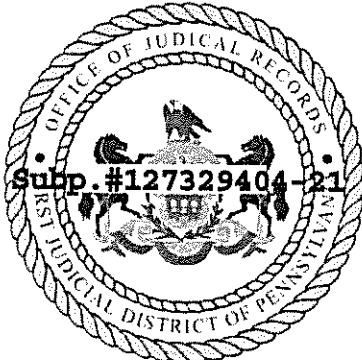
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: October 06, 2017



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Bensalem Police Department
2400 Byberry Road
Bensalem PA 19020
Attention: Records Department

Subject: Branham a/k/a Paul Johnson, Paul

Requested Items:

Please Remit: Any and all documents related to Paul Branham a/k/a Paul Johnson and/or Criminal Docket No: CP-09-CR-0002691-2015 and/or Complaint/Incident No. 1502816, including but not limited to prostitution, solicitation, and human trafficking, and human trafficking on 5956-5960 Harbison Avenue, Philadelphia, PA 19135 A/K/A 4220 Comly Street, from 2012 to the present, including any and all related arrest reports, incident reports, reports of telephone calls made, witness statements, handwritten notes, typed reports, affidavits of probable cause, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, photographs, discovery exchanged, and any other documents in your file relating to Criminal Docket No: CP-09-CR-0002691-2015 and/or Paul Branham a/k/a Paul Johnson.

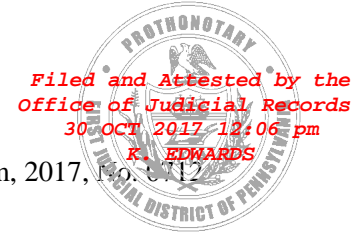
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Court of Common Pleas
Calandra, Esquire

vs.

Roosevelt Inn LLC, Roosevelt Motor Inn,
Inc., UFVS Management Co, LLC, and
Yagna Patel

Case Number: March Term, 2017, No. 0712



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 10/27/2017

Litigation Solutions, LLC on behalf of

Justina Byers, Esquire

Attorney for the Defendant

CC:
Justina Byers, Esquire
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire
vs.
Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
Patel

Court of Common Pleas
March Term, 2017, No. 0712

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21

Provider:

Glen Mills Schools
Bucks County District Attorney
Philadelphia District Attorneys Office

Record Type:

Scholastic
Miscellaneous
Miscellaneous

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:

Litigation Solutions, LLC (412.263.5656)

Brentwood Towne Centre

101 Towne Square Way, Suite 251

Pittsburgh, PA 15227

**COUNSEL LISTING FOR M.B., A MINOR BY HER GUARDIAN, WILLIAM A. CALANDRA, ESQUIRE VS. ROOSEVELT INN LLC,
ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT CO, LLC, AND YAGNA PATEL**

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Kline, Esquire, Thomas R.	1525 Locust Street 19th Floor Philadelphia, PA 19102 P: 215-772-1000 F: 215-735-0937	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Bucks County District Attorney

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

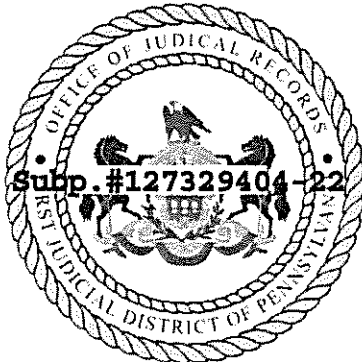
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: October 06, 2017



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Bucks County District Attorney
55 East Court Street
Doylestown PA 18901
Attention: Records Department

Subject: Davis, Daiquan

Requested Items:

Please Remit: Any and all documents relating to Daiquan Davis (D.O.B. 9/1993, SSN 198-74-2830) including but not limited to prostitution, solicitation and human trafficking at the Roosevelt Inn from 2010 to the present, including any and all related arrest reports, incident reports, reports of telephone calls made from the Roosevelt Inn, witness statements, handwritten notes, typed reports, affidavits, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, phonographs, discovery exchanged and any other documents in your file relating to Daiquan Davis.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Glen Mills Schools

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

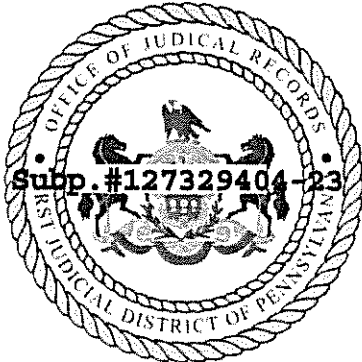
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Date: October 06, 2017

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Glen Mills Schools
185 Glen Mills Road
Glen Mills PA 19342
Attention: Office of the Registrar

Subject: Davis, Daiquan

Requested Items:

Please Remit: Any and all documents relating to Daiquan Davis (D.O.B. 9/1993, SSN 198-74-2830), including but not limited to grade reports, transcripts, attendance sheets, counselor evaluations, discipline summaries, for years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Philadelphia District Attorneys Office

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

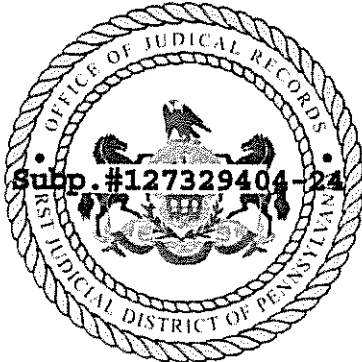
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Philadelphia District Attorneys Office
Three South Penn Square
Philadelphia PA 19107
Attention: Records Department

Subject: Davis, Daiquan

Requested Items:

Please Remit; Any and all documents relating to Daiquan Davis (D.O.B. 9/1993, SSN 198-74-2830) including but not limited to prostitution, solicitation and human trafficking at the Roosevelt Inn from 2010 to the present, including any and all related arrest reports, incident reports, reports of telephone calls made from the Roosevelt Inn, witness statements, handwritten notes, typed reports, affidavits, information filed, related criminal records, recorded interviews, transcribed statements, depositions and/or other sworn testimony, trial transcripts, phonographs, discovery exchanged and any other documents in your file relating to Daiquan Davis.

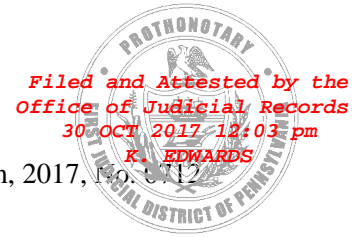
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Court of Common Pleas
Calandra, Esquire

vs.

Roosevelt Inn LLC, Roosevelt Motor Inn,
Inc., UFVS Management Co, LLC, and
Yagna Patel

Case Number: March Term, 2017, No. 0712



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 10/27/2017

Litigation Solutions, LLC on behalf of

Justina Byers, Esquire

Attorney for the Defendant

CC:
Justina Byers, Esquire
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire
 vs.
 Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna
 Patel

Court of Common Pleas
 March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
 RULE 4009.21**

Provider:

Record Type:

Warren G. Harding Middle School	Scholastic
Wordsworth Academy	Scholastic
Hazleton Elementary Middle School	Scholastic
George W. Sharswood Elementary School	Scholastic
Arthur Street Elementary School	Scholastic
Arthur Powell	Miscellaneous
Kelly Mahon Beason	Miscellaneous
Robert Beason	Miscellaneous
A Second Chance Inc. - Kinship Care	Medical
The Villa - Public Health Management Corporation	Medical
David Abel	Medical
Joseph J. Peters Institute	Medical
David Abel	Medical
The Bridge Therapeutic Center at Fox Chase	Medical
Lois Harrold	Medical
Lois Harrold	Medical
Y-HEP Health Center	Medical
Patricia H. Morgan MSN CRNP	Medical
Pennsylvania Hospital - Hall-Mercer Community Mental Health	Medical
Pepper George Middle School	Scholastic

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
 of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
 Defense

If you have any questions regarding this matter, please contact:
 Litigation Solutions, LLC (412.263.5656)
 Brentwood Towne Centre
 101 Towne Square Way, Suite 251
 Pittsburgh, PA 15227

**COUNSEL LISTING FOR M.B., A MINOR BY HER GUARDIAN, WILLIAM A. CALANDRA, ESQUIRE VS. ROOSEVELT INN LLC,
ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT CO, LLC, AND YAGNA PATEL**

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Kline, Esquire, Thomas R.	1525 Locust Street 19th Floor Philadelphia, PA 19102 P: 215-772-1000 F: 215-735-0937	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A Second Chance, Inc. - Kinship Care

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

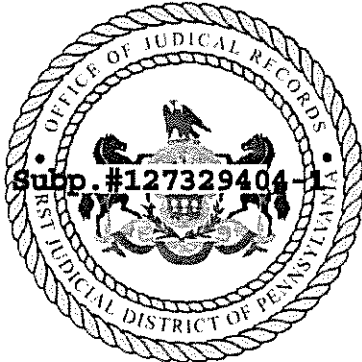
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A Second Chance, Inc. - Kinship Care
1341 N. Delaware Avenue #101
Philadelphia PA 19125
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. David Abel

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Dr. David Abel
1638 Amity Road
Jenkintown PA 19046
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. David Abel

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

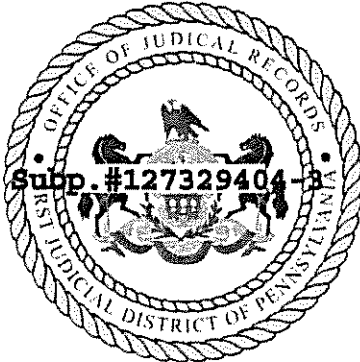
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Dr. David Abel
54 East Oakland Avenue
Doylestown PA 18901
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Arthur Street Elementary School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Arthur Street Elementary School
424 E. 9th Street
Hazleton PA 18201
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: George W. Sharswood Elementary School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

Name: Justina Byers, Esquire
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

George W. Sharswood Elementary School
2300 S. Second Street
Philadelphia PA 19148
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. Lois Harrold

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

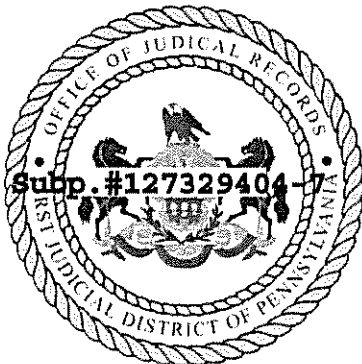
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

CRNP Lois Harrold
1421 Highland Avenue
Abington PA 19001
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. Lois Harrold

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

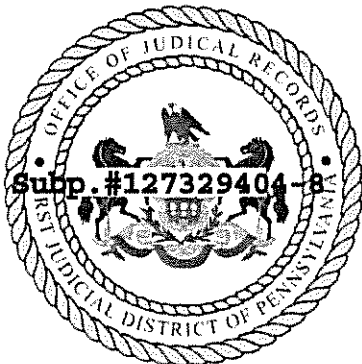
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

CRNP Lois Harrold
1109 DeKalb Street
Norristown PA 19401
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Hazleton Elementary Middle School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Hazleton Elementary Middle School
700 N. Wyoming Street
Hazleton PA 18201
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Joseph J. Peters Institute

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

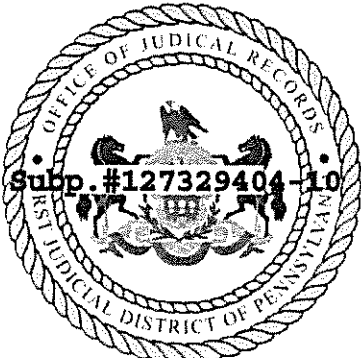
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: October 06, 2017



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Joseph J. Peters Institute
1211 Chestnut Street 5th Floor
Philadelphia PA 19107
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Patricia H. Morgan, MSN, CRNP

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

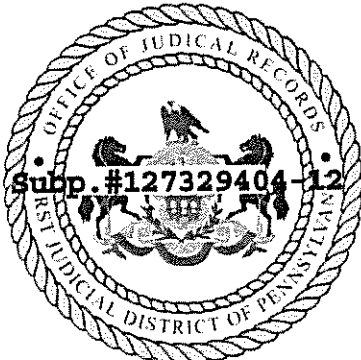
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Patricia H. Morgan, MSN, CRNP
1421 Highland Avenue
Abington PA 19001
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Pennsylvania Hospital - Hall-Mercer Community Ment
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

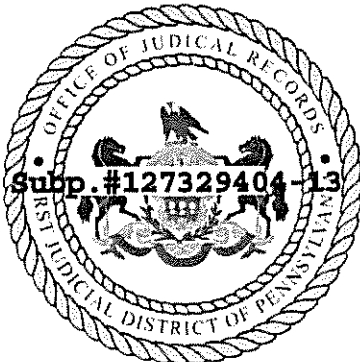
Date: October 06, 2017

Name: Justina Byers, Esquire
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Pennsylvania Hospital - Hall-Mercer Community Mental Health
245 S. 8th Street
Philadelphia PA 19106
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Pepper George Middle School

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

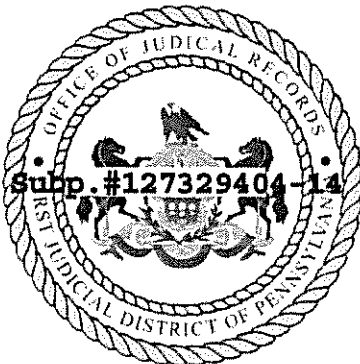
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Pepper George Middle School
2901 S. 84th Street
Philadelphia PA 19153
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: The Bridge Therapeutic Center at Fox Chase
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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This subpoena was issued at the request of the following person:

Date: October 06, 2017

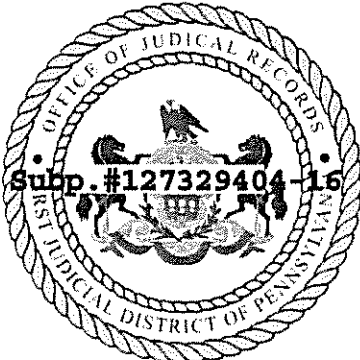
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

The Bridge Therapeutic Center at Fox Chase
1100 Adams Avenue
Philadelphia PA 19124
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: The Villa - Public Health Management Corporation
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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This subpoena was issued at the request of the following person:

Date: October 06, 2017

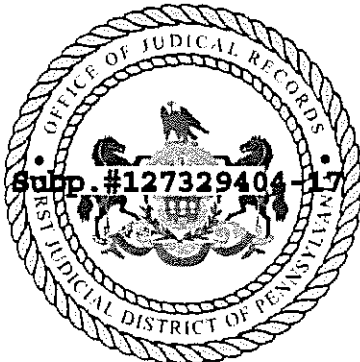
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

The Villa - Public Health Management Corporation
Centre Square East 1500 Market Street, Suite 1500
Philadelphia PA 19102
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Warren G. Harding Middle School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

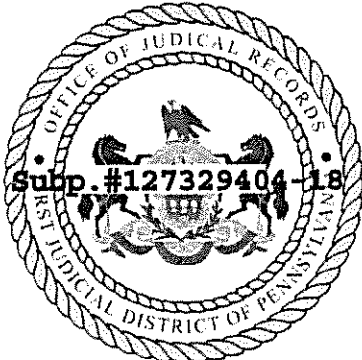
Date: October 06, 2017

Name: Justina Byers, Esquire
Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Warren G. Harding Middle School
2000 Wakeling Street
Philadelphia PA 19124
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Wordsworth Academy

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

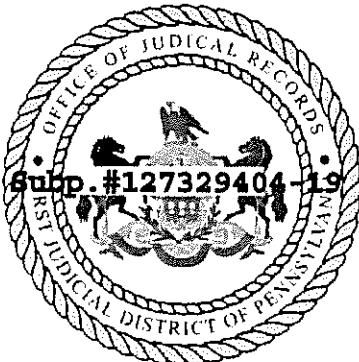
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Wordsworth Academy
2101 Pennsylvania Avenue
Fort Washington PA 19034
Attention: Office of the Registrar

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to Madison Beason (born 9/3/99; SSN 195-78-8118) including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Y-HEP Health Center

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Y-HEP Health Center
1417 Locust Street 2nd Floor
Philadelphia PA 19102
Attention: Medical Records Correspondence

Subject: Beason, Madison

Requested Items:

Please remit: Please remit: Any and all medical records relating to Madison Beason (D.O.B. 9/03/1999; SSN 195-78-8118) including but not limited to treatment records.

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

Filed and Attested by the
Office of Judicial Records
31 OCT 2017 02:20 pm
B. KISTELEWSKI

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

STIPULATION

BY WAY OF STIPULATION AND AGREEMENT, between the parties by the signatures of the undersigned counsel, it is hereby **STIPULATED AND AGREED**, to **SEAL** the Certificate Prerequisite to the Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22 issued to multiple providers, including Warren G. Harding Middle School and the Wordsworth Academy, which was filed on October 30, 2017, E-File No. 1710069820.

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
*Attorneys for Minor-Plaintiff M.B.,
Minor by her Guardian, William A.
Calandra, Esquire*

BLANK ROME LLP



GRANT S. PALMER, ESQUIRE
JAMES J. QUINLAN, ESQUIRE
JUSTINA A. BYERS, ESQUIRE
DANIEL E. OBERDICK, ESQUIRE
*Attorneys for Defendants Roosevelt
Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor
Inn, Inc. d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC
and Yagna Patel*

Date: 10/31/2017

Date: 10/31/17

SO ORDERED:

150213.00601/106283331v.1

J.

Case ID: 170300712
Control No.: 17103863

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION
Filed and Attested by the
Office of Judicial Records
OCT 2017 07:20 pm
B. KISTELEWSKI

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

B. Etal Vs Roosevelt In-STPAP



17030071200038

STIPULATION

BY WAY OF STIPULATION AND AGREEMENT, between the parties by the signatures of the undersigned counsel, it is hereby **STIPULATED AND AGREED**, to **SEAL** the Certificate Prerequisite to the Service of a Subpoena Pursuant to Pa.R.C.P. 4009.22 issued to multiple providers, including Warren G. Harding Middle School and the Wordsworth Academy, which was filed on October 30, 2017, E-File No. 1710069820.

KLINE & SPECTER, P.C.

THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
*Attorneys for Minor-Plaintiff M.B.,
Minor by her Guardian, William A.
Calandra, Esquire*

BLANK ROME LLP

GRANT S. PALMER, ESQUIRE
JAMES J. QUINLAN, ESQUIRE
JUSTINA A. BYERS, ESQUIRE
DANIEL E. OBERDICK, ESQUIRE
*Attorneys for Defendants Roosevelt
Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor
Inn, Inc. d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC
and Yagna Patel*

Date: 10/31/2017

Date: 10/31/17

150213.00601/106283331v.1

SO ORDERED:

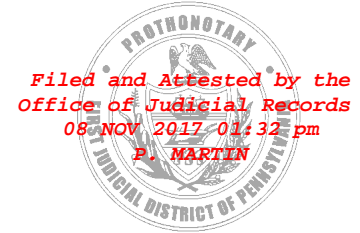
10-31-17 J.

Case ID: 170300712
Control No.: 17103863

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY: Kyle Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

Date: 11/8/17

CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
 THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- | | |
|---|--|
| • The Villa | • Tabor Children's Services |
| • VisionQuest | • First Home Care |
| • Joseph J. Peters Institute | • Asociacion Puertorriquenos en Marcha, Inc. ("APM") |
| • Sobriety Through Outpatient Philadelphia | • Philadelphia Department of Human Services |
| • New Directions Treatment Services | |
| • Visiting Nurse Association Community Services | |

KLINE & SPECTER, P.C.

BY:



KYLE B. NOCHO, ESQUIRE
 Attorney for Minor-Plaintiff

Date: 10/5/2017


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date;

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

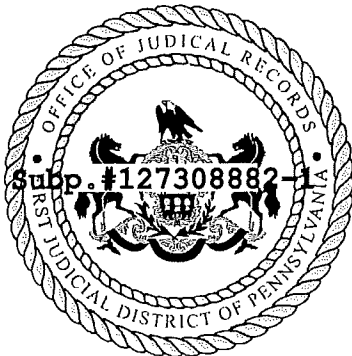
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: 9/3/1999

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

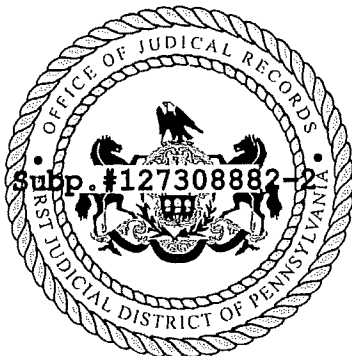
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISIONQUEST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

**VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. DOB: 9/3/1999

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: JOSEPH J. PETERS INSTITUTE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: JOSEPH J. PETERS INSTITUTE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

JOSEPH J. PETERS INSTITUTE
100 South Broad Street, 17th Floor.
Philadelphia, PA 19110
Attn: Custodian of Records

M.B. **DOB: 9/3/1999**

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17
No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B. **DOB: 9/3/1999**

You are to provide any and all records pertaining to I M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

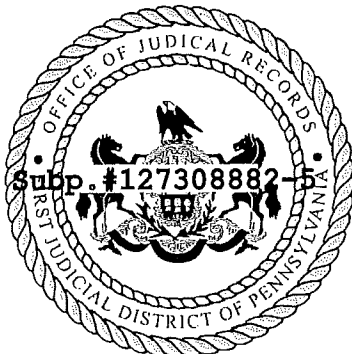
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB: 9/3/1999**

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

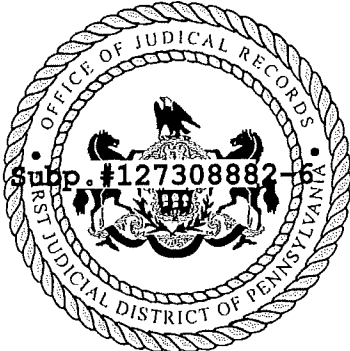
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Visiting Nurse Association Community Services, Inc.
1421 Highland Avenue
Abington, PA 19001
Attn: Custodian of Records

M.B. **DOB: 9/3/1999**

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: TABOR CHILDREN'S SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: TABOR CHILDREN'S SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

TABOR CHILDREN'S SERVICES
57 E. Armat Street
Philadelphia, PA 19144
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. DOB: 9/3/1999

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: FIRST HOME CARE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: FIRST HOME CARE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

**FIRST CARE HOME
4641 Roosevelt Boulevard
Philadelphia, PA 19124
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. DOB: 9/3/1999

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to **M.B.**, and any and all documents you may have relating to **M.B.** including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding **M.B.**.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

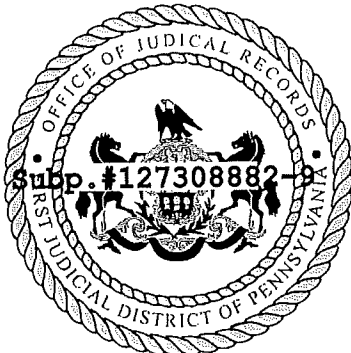
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

APM

1900 North 9th Street

Philadelphia, PA 19122

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB: 9/3/1999**

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

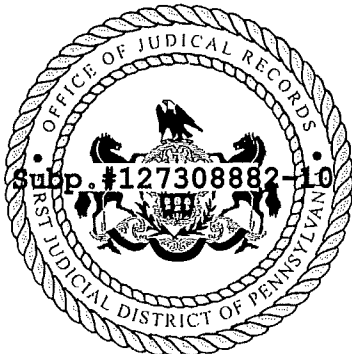
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365
Supreme Court ID#: 319270
Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced. *(Date of Subpoena)*

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

1515 Arch Street, 16th Floor

Philadelphia, PA 19102

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB: 9/3/1999**

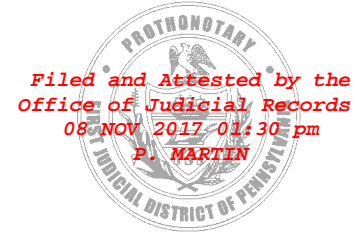
Within twenty (20) days after the service of this subpoena, you are ordered by the court to produce the following documents or things: any and all records pertaining to M.B. ; DOB: 9/3/1999, including but not limited to any and all CUA records, correspondence to and/or from other agencies or individuals, child placement, child permanency plans, case notes, court orders, investigation reports, medical records including psychiatric treatment records, evaluation reports and counseling records, and any other document to consist of your entire file regarding

M.B.

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

(1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,

(2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,

(3) no objection to the subpoenas has been received, and

(4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY: Kyle Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

Date: 11/8/17


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Plaintiffs

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE
 DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
 TO RULE 4009.21**

Plaintiffs intend to serve subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objection to the Subpoenas. If no objection is made, the Subpoenas may be served.

- Keystone First

KLINE & SPECTER, P.C.

BY: Kyle Nocho
 KYLE B. NOCHO, ESQUIRE
 Attorney for Plaintiffs

Date: 10/10/2017

CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via First Class Mail on the date below:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/10/2017



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: KEYSTONE FIRST

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 10, 2017

Address: KLINE & SPECTER, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: KEYSTONE FIRST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____
(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

**KEYSTONE FIRST
200 Stevens Drive
Philadelphia, PA 19113**

M.B. DOB: 9/3/1999

You are to provide any and all records pertaining to **M.B.** including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, billing information, medical providers, health insurance information, health insurance policies, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding **M.B.**

**NOTICE OF STANDING ORDER FOR ALL CASES PENDING BEFORE
JUDGE LISA M. RAU**

AND NOW, this **15th** day of **November, 2017**, all parties and counsel are hereby **NOTIFIED** that because Judge Lisa Rau's spouse, Lawrence Krasner, was a candidate for District Attorney in Philadelphia, there is a possibility that someone involved in this case (counsel, party, or witness) may have made a financial contribution to Judge Rau's spouse's or another District Attorney candidate's campaign fund or PAC.

All counsel and parties are therefore **DIRECTED** to review Judge Rau's Standing Order, available at <http://www.courts.phila.gov/pdf/cpcivil/rso.pdf>, which details the procedures that the Court is implementing to allow counsel and litigants to raise any concerns they may have where someone involved in a case assigned to Judge Rau has made contributions to Judge Rau's spouse's campaign fund or PAC or that of another candidate who ran for District Attorney.

BY THE COURT:

Lisa M. Rau, J.

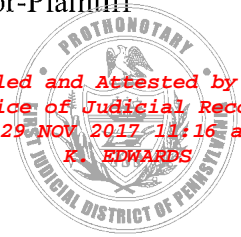
KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Minor-Plaintiff

*Filed and Attested by the
Office of Judicial Records
29 NOV 2017 11:16 am
K. EDWARDS*



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

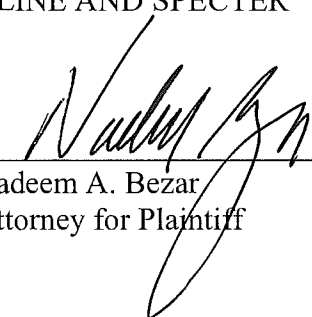
PRAECIPE TO REINSTATE AMENDED COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Amended Complaint in the above-captioned matter.

KLINE AND SPECTER

Date: 11/29/17



Nadeem A. Bezar
Attorney for Plaintiff

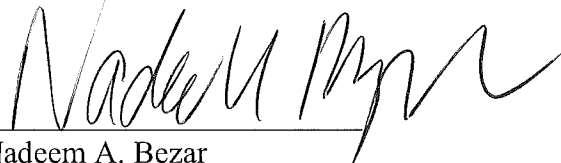
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of November, **2017** the foregoing Praecept to Reinstate Amended Complaint was filed and upon acceptance of the Court mailed via Regular Mail and/or electronic mail to the below listed Defendants:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Alpha-Centurion Security, Inc.
c/o Joanna M. Small, President
224 Glendale Road
Havertown, PA 19093

KLINE AND SPECTER

A handwritten signature in black ink, appearing to read 'Nadeem A. Bezar', written over a horizontal line.

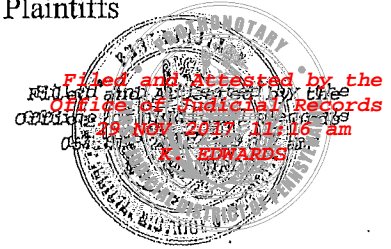
Nadeem A. Bezar
Attorney for Plaintiff

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Plaintiffs



M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
c/o Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
287 Bowman Avenue
Purchase, NY 10577

and

YAGNA PATEL
7630 Roosevelt Boulevard
Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
3720 West Chester Pike

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073

Defendants

:
:

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT
HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS
OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION
ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO
ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE

One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Lo han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) dias a partir de recibir esta demanda y notificacion para entablar personalmente o por un abogado una comparecencia oserita y tambien para entablar con la corte en forma oserita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.

SERVICIO de REFERENCIA LEGAL

Uno Reading Centro
Philadelphia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

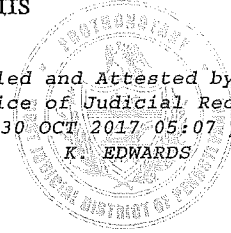
KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiffs

Filed and Attested by the
 Office of Judicial Records
 30 OCT 2017 05:07 pm
 K. EDWARDS



M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 c/o Kline & Specter, P.C.
 1525 Locust Street
 Philadelphia, PA 19102

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

UFVS MANAGEMENT COMPANY, LLC
 287 Bowman Avenue
 Purchase, NY 10577

and

YAGNA PATEL
 7630 Roosevelt Boulevard
 Philadelphia, PA 19152

and

ALPHA-CENTURION SECURITY, INC.
d/b/a ALPHA CENTURY SECURITY, INC.
 3720 West Chester Pike

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

Newtown Square, PA 19073

Defendants

:
:

MINOR-PLAINTIFF'S AMENDED COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1200 cases of sex trafficking has been reported for the first six months of 2016 with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014 the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that directly or indirectly benefits financially from such acts is fully deterred through both criminal and civil prosecution.

THE PARTIES

4. Minor-Plaintiff, M.B. was born on September 3, 1999, and is one of the thousands of victims of human trafficking in the United States. During 2013 and 2014, Minor-Plaintiff was exploited and was permitted to be exploited by traffickers of commercial sex acts and those who financially benefitted from her exploitation. Minor-Plaintiff resides in Philadelphia County, Pennsylvania. Minor-Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102. Minor-Plaintiff's guardian for purposes of this civil

action is William A. Calandra, Esquire.

5. Minor-Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Minor-Plaintiff M.B. who incurred injuries and damages starting when she was fourteen (14) years old.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as "Roosevelt Inn LLC"] is a corporation duly organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the "Roosevelt Inn"].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as "Roosevelt Motor Inn, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a corporation duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Defendant Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc. [hereinafter referred to as "Alpha-Centurion Security, Inc."] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn.

11. Upon information and belief, at all times relevant hereto, Defendant Alpha-Centurion Security, Inc. provided paid for security and related services at the Roosevelt Inn located at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania 19152, incidental to a contractual arrangement as between itself and the owners and operators of the premises: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

12. Defendant Alpha-Centurion Security, Inc. occupied, controlled, patrolled, monitored and assumed responsibility for security of the premises located at the Roosevelt Inn, 630 Roosevelt Boulevard, Philadelphia, PA 19152.

13. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn and assumed responsibility for ensuring the safety and wellbeing of individuals lawfully on the premises, including Minor-Plaintiff M.B.

14. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC, and Alpha-Centurion Security, Inc. regularly conduct business in Philadelphia County.

15. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted individually and/or by and through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

16. At all times material hereto, Alpha-Centurion Security, Inc. acted individually and/or by and through its actual or apparent agents, servants and employees, including but not limited to security guards and is therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

17. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

18. At all material times hereto, Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, was uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn.

19. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur and profited from them.

20. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

21. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor

Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by their actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

22. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel received money and financially profited from the commercial sex acts occurring on the premises of the Roosevelt Inn.

24. At all material times hereto, Defendant Alpha-Centurion Security, Inc. received money and financially profited, while having knowledge of the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

25. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3001, et. seq., it is a felony to recruit, entice, solicit, harbor or transport a minor which results in the minor being subjected to sexual servitude.

26. Commencing in 2013, Minor-Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

27. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided, for their own financial benefit, rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts

with Minor-Plaintiff.

28. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn in approximately March 2007 to provide security services.

29. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired to ensure the safety and wellbeing of individuals lawfully on the hotel's premises, the hotel's guests, the hotel's employees, and the hotel's property.

30. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff.

31. It is believed and therefore averred that all of the responsibilities as aforesaid were well within the scope of the contractual responsibilities promised and undertaken by Defendant Alpha-Centurion Security, Inc. as part of its agreement to provide security services on the premises of the Roosevelt Inn.

32. Defendant Alpha-Centurion Security, Inc. assumed responsibility for protecting individuals lawfully present at the Roosevelt Inn, including Minor-Plaintiff from foreseeable harm, including commercial sex exploitation and human sex trafficking.

33. Having undertaken responsibilities as aforesaid, Defendant Alpha-Centurion Security owed a duty to Minor-Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Minor-Plaintiff from dangerous people and conditions on the premises.

34. Defendant Alpha-Centurion Security, Inc. provided security services for its own financial benefit, while traffickers used the rooms at the Roosevelt Inn to engage in commercial

sex acts with Minor-Plaintiff.

35. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Minor-Plaintiff for commercial sex acts.

36. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that rooms and services were being rented or otherwise provided to individuals trafficking Minor-Plaintiff for commercial sex acts, while Alpha-Centurion Security, Inc. had a duty to protect individuals lawfully present at the Roosevelt Inn, like Minor-Plaintiff.

37. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

38. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that Minor-Plaintiff was being sexually exploited.

39. Minor-Plaintiff's traffickers put up internet advertisements for the purpose of prostituting Minor-Plaintiff.

40. The advertisements would include a fake name for Minor-Plaintiff and a phone number to call.

41. During the phone call, sex for cash was negotiated and the caller "John" would be

informed that Minor-Plaintiff was at the Roosevelt Inn.

42. The “John” who negotiated to have sex for cash with Minor-Plaintiff would then speak to the front desk clerk at the Roosevelt Inn.

43. An individual named “Abdul” would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of “Abdul” is known to Defendants.

44. “Abdul” would then direct the individual to the floor and room where Minor-Plaintiff and her traffickers were staying.

45. “Abdul” was fully aware that Minor-Plaintiff and other underage children were compelled to perform sex for money.

46. Minor-Plaintiff’s traffickers would linger in the halls and on the premises of the Roosevelt Inn.

47. The motel room where Minor-Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

48. Minor-Plaintiff engaged in numerous commercial sex acts “dates” per day.

49. Minor-Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

50. Housekeepers and front desk staff including “Abdul” at the Roosevelt Inn maintained conversations with Minor-Plaintiff and had knowledge that Minor-Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

51. Minor-Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Minor-Plaintiff.

52. Minor-Plaintiff exhibited fear and anxiety while on the premises of the Roosevelt Inn.

53. Minor-Plaintiff's traffickers paid cash for the motel rooms where Minor-Plaintiff engaged in commercial sex acts.

54. Minor-Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Minor-Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

55. Men and other minors frequently entered and left the rooms where Minor-Plaintiff engaged in commercial sex acts.

56. Men stood in the hallways outside of rooms where Minor-Plaintiff was engaged in commercial sex acts.

57. Minor-Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

58. Minor-Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

59. Security guards and/or employees of Defendant Alpha-Centurion Security, Inc. observed Minor-Plaintiff at the Roosevelt Inn in her sexually explicit clothing.

60. Minor-Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

61. Minor-Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash as payment for the motel rooms to the financial profit of all Defendants as owners, operators and managers of the Roosevelt Inn.

62. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual

or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

63. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff.

64. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel financially profited from the continuation of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

65. Defendant Alpha-Centurion Security, Inc. financially profited from providing security services at the Roosevelt Inn, while having knowledge of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

66. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

67. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of

life's pleasures both in the past and in the future.

68. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

69. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited from providing security services at the Roosevelt Inn, while having knowledge of the human sex trafficking occurring and failing to report, intervene, disrupt or otherwise stop the practice.

70. By harboring Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

71. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Minor-Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

COUNT I - NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN

TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

72. The averments of Paragraphs 1 through 71 are incorporated herein by reference.

73. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

74. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

75. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

76. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, financially profited from the human trafficking and continued profit by not reporting, intervening, disrupting or otherwise stopping the practice.

77. By harboring the Minor-Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel,

individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

78. The averments of Paragraphs 1 through 77 are incorporated herein by reference.

79. Pennsylvania's Human Trafficking Law 18 PA C.S.A. §3001 et seq. makes it illegal to recruit, entice, harbor, or transport any minor for the purpose of causing or permitting the minor to be engaged in any commercial sex act.

80. Defendant Alpha-Centurion Security, Inc. assumed a duty to protect the safety and wellbeing of individuals lawfully present at the Roosevelt Inn, the hotel's employees, and the hotel's guests.

81. Yet, Defendant Alpha-Centurion Security, Inc. harbored Minor-Plaintiff by helping to provide a place of refuge and shelter for commercial sexual exploitation and sex trafficking.

82. Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and sex trafficking occurring at the Roosevelt Inn, but failed to report, intervene, disrupt or otherwise stop the practice.

83. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, did recruit and/or entice and/or harbor and/or transport the minor Plaintiff permitting her to be exploited and engage in the commercial sex acts.

84. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Minor-Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

85. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, financially profited while allowing human trafficking to occur and continued to profit while not reporting, intervening, disrupting or otherwise stopping the practice.

86. By harboring the Minor-Plaintiff for commercial sex acts, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

87. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III - NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

88. The averments of paragraphs 1 through 87 are incorporated herein by reference.

89. By harboring Minor-Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

90. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

91. As a result of Defendants' Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligence, Defendants financially profited from the human sex trafficking and continued to profit by not reporting, intervening, disrupting or otherwise stopping the practice.

92. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment

delay.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

93. The averments of paragraphs 1 through 92 are incorporated herein by reference.

94. Having undertaken responsibilities as aforesaid and the provision of security services at the Roosevelt Inn, Defendant Alpha-Centurion Security, Inc. owed a duty to protect the safety and wellbeing of individuals lawfully present at the hotel, the hotel's guests, the hotel's employees, and the hotel's property.

95. Defendant Alpha-Centurion Security, Inc. failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Minor-Plaintiff, although Defendant Alpha-Centurion Security, Inc. had knowledge of commercial sex activity and human trafficking occurring at the Roosevelt Inn.

96. Defendant Alpha-Centurion Security, Inc., by and through its agents, ostensible agents, officers, servants, and/or employees, was negligent by:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish post orders at the security posts providing protocols for security personnel to follow in circumstances involving commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;
- f. Failing to prevent entry of unauthorized individuals onto the premises;

- g. Failing to properly and adequately train and provide ongoing training to its security personnel including but not limited to ongoing training involving preventing and responding to commercial sexual activity and human sex trafficking;
- h. Failing to select and/or retain only personnel competent to provide proper and adequate security services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a hotel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Minor-Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;
- u. Failing to adequately monitor activity on video surveillance and promptly react

thereto for the safety of Minor-Plaintiff;

- v. Allowing individuals to come on to the premises for the express purpose of conducting commercial sex acts with Minor-Plaintiff;
- w. Failing to prevent Minor-Plaintiff from being trafficked on the premises; and
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344.

97. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Minor-Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

98. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Defendant Alpha-Centurion Security, Inc. financially profited from providing security services that allowed the existence of human sex trafficking, while not reporting, intervening, disrupting or otherwise stopping the practice.

99. Each of the herein-described tortuous or otherwise culpable acts or omissions by Defendant Alpha-Centurion Security, Inc. increased the likelihood that Minor-Plaintiff would suffer the injuries set forth in this Complaint.

100. Defendant Alpha-Centurion Security, Inc.'s negligence increased the risk of harm to Minor-Plaintiff and was a substantial factor in causing and continuing the harm and damages suffered by Minor-Plaintiff.

101. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

102. **WHEREFORE**, Minor-Plaintiff M.B. demands judgment in her favor and

against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT V - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. The averments of paragraphs 1 through 102 are incorporated herein by reference.

104. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

105. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

106. The averments of paragraphs 1 through 105 are incorporated herein by reference.

107. Defendant Alpha-Centurion Security, Inc. negligently committed the acts averred in this Complaint against the Minor-Plaintiff and thereby caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Minor-Plaintiff.

108. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VII - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. The averments of paragraphs 1 through 108 are incorporated herein by reference.

110. By harboring Minor-Plaintiff to perform commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

111. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VIII - INTENTIONAL INFLCTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC.

112. The averments of paragraphs 1 through 111 are incorporated herein by reference.

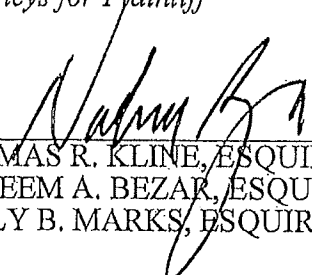
113. By harboring Minor-Plaintiff to perform commercial sex acts, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

114. By having knowledge of commercial sex activity and failing to intervene, Defendant Alpha-Centurion Security, Inc. intentionally caused Minor-Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Minor-Plaintiff.

115. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Minor-Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Minor-Plaintiff M.B, demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc, and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.
Attorneys for Plaintiff

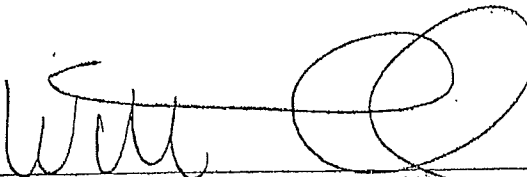
BY: 
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

DATED: 9/5/17

VERIFICATION

I, William A. Calandra, Esquire, hereby state that I am the Guardian for the Minor-Plaintiff, M.B., in this matter. I hereby verify that I have reviewed the foregoing Minor-Plaintiff's First Amended Complaint, which was prepared with the assistance of counsel, and that while I do not have personal knowledge of all of the facts and representations therein, the averments appear to be true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



WILLIAM A. CALANDRA, ESQUIRE
Guardian for Minor-Plaintiff M.B.

PHILADELPHIA COURT OF COMMON PLEAS
PETITION/MOTION COVER SHEET

FOR COURT USE ONLY	
ASSIGNED TO JUDGE:	ANSWER/RESPONSE DATE:
<i>Do not send Judge courtesy copy of Petition/Motion/Answer/Response. Status may be obtained online at http://courts.phila.gov</i>	

CONTROL NUMBER:

17120686

**(RESPONDING PARTIES MUST INCLUDE THIS
NUMBER ON ALL FILINGS)**

March 2017
Month Term, Year
No. 00712

B. ETAL VS ROOSEVELT INN LLC ETAL

Name of Filing Party:

M. B. -PMNR

WILLIAM A. CALANDRA-PGRD

INDICATE NATURE OF DOCUMENT FILED:

☐ Petition (*Attach Rule to Show Cause*) ☒ Motion
☐ Answer to Petition ☐ Response to Motion

Has another petition/motion been decided in this case? ☐ Yes ☒ No

Is another petition/motion pending? ☐ Yes ☒ No

If the answer to either question is yes, you must identify the judge(s):

TYPE OF PETITION/MOTION (see list on reverse side)		PETITION/MOTION CODE (see list on reverse side)
MOTION FOR ALTERNATIVE SERVICE		MTSVR
ANSWER / RESPONSE FILED TO (Please insert the title of the corresponding petition/motion to which you are responding):		
I. CASE PROGRAM DAY FORWARD/MAJOR JURY PROGRAM Name of Judicial Team Leader: <u>JUDGE LISA RAU</u> Applicable Petition/Motion Deadline: <u>N/A</u> Has deadline been previously extended by the Court: <u>N/A</u>		II. PARTIES (<i>required for proof of service</i>) (Name, address and telephone number of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.) NADEEM A BEZAR KLINE & SPECTER, P.C. 1525 LOCUST STREET, PHILADELPHIA PA 19102 JUSTINA L BYERS ONE LOGAN SQUARE, PHILADELPHIA PA 19103 ALPHA-CENTURION SECURITY, INC. 3720 WEST CHESTER PIKE, NEWTOWN SQUARE PA 19073
III. OTHER		

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, will be served upon all counsel and unrepresented parties as required by rules of Court (see PA. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, moving party verifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

(Attorney Signature/Unrepresented Party) December 4, 2017 (Date) KYLE B. NOCHO (Print Name) _____ (Attorney I.D. No.)

**The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date.
No extension of the Answer/Response Date will be granted even if the parties so stipulate.**

Civil Administration

C. KEENAN

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

ORDER

AND NOW, this _____ day of _____, 2017, upon consideration of the Petition for Alternate Service pursuant to Pa. R.C.P. 430(a), and any response thereto, it is hereby ORDERED and DECREED that Minor-Plaintiff's Petition is GRANTED. Accordingly, service of the Amended Complaint upon Defendant Alpha-Centurion Security, Inc. shall be made upon Defendant's owner, Joanna Small, at her home address of 224 Glendale Road, Havertown, Pennsylvania 19083, as follows:

1. First class mail, or
2. Certified Mail, return receipt requested, or
3. Posting a copy of Plaintiff's Complaint by the Sheriff.

BY THE COURT:

J.

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

PETITION FOR ALTERNATE SERVICE

Petitioner, Minor-Plaintiff M.B., by and through her attorneys, Kline & Specter, P.C., hereby respectfully petitions this Court for leave, pursuant to Pa. R.C.P. 430(a) to serve Defendant Alpha-Centurion Security, Inc. by service upon its owner, Joanna Small, by first class mail, certified mail return receipt requested, or by posting by the Sheriff at Joanna Small's home, 224 Glendale Road, Havertown, Pennsylvania 19083.

1. This case involves the human sex trafficking of Minor-Plaintiff M.B. at the Roosevelt Inn at 7600 Roosevelt Boulevard, Philadelphia, PA 19152.

2. Plaintiff initiated suit by Complaint against the owners and operators of the Roosevelt Inn: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

3. Through the discovery process, Minor-Plaintiff learned the identity of the security company Alpha-Centurion Security, Inc. (hereinafter referred to as “Alpha”), which was employed by the Roosevelt Inn to safeguard the motel at the time the sex trafficking of Minor-Plaintiff occurred.

4. The parties agreed to a stipulation allowing Minor-Plaintiff to amend the Complaint to add Alpha as a defendant in this case, which was filed with the Court. *See* the Stipulation attached as Exhibit A.

5. Service of the Amended Complaint was attempted at the apparent business addresses for Alpha. But, the business seems to have been closed down and therefore service could not be made. *See* Affidavit of non-service upon Alpha, attached as Exhibit B.

6. Joanna Small is the owner of Defendant Alpha. Small is also the owner of a house located at 224 Glendale Road, Havertown, Pennsylvania 19083, where upon information and belief, Small resides.

7. The Delaware County Sheriff’s Office has attempted to serve the Amended Complaint upon Joanna Small at 224 Glendale Road, Havertown, Pennsylvania 19083 multiple times, at different times of day and weekends. Each time, Joanna Small has refused to open the door and refused to receive service of the Amended Complaint. *See* Affidavit of non-service upon Joanna Small, attached as Exhibit C.

8. The Delaware County Sheriff's Office has attempted to serve Joanna Small as a defendant at her residence at 224 Glendale Road, Havertown Pennsylvania 19083, in other lawsuits, and she has refused to accept service in those cases too. *See* Ex. C.

9. It is submitted that Joanna Small, owner of Defendant Alpha, is evading service of process.


10. Plaintiff is prejudiced by Joanna Small's failure to accept service of the Complaint for her business, Defendant Alpha.

11. Plaintiff thus requests that this court allow service either by: 1) first class mail; 2) certified mail, return receipt requested; or 3) posting a copy of Plaintiff's Amended Complaint by the Sheriff.

WHEREFORE Petitioner, Minor-Plaintiff M.B., respectfully request that this honorable Court grant the within Petition for Alternate Service, allowing the Amended Complaint to be served at the property owned by Joanna Small, located at 224 Glendale Road, Havertown, Pennsylvania 19083, by first class mail, certified mail return receipt requested, or by posting the Complaint by the Sheriff at 224 Glendale Road, Havertown, Pennsylvania 19083.

Respectfully submitted,

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of December, 2017, the foregoing Petition for Alternate Service was electronically filed and upon acceptance electronically served upon the below listed counsel:


Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel
Counsel for Defendants Roosevelt Inn, LLC*

I do hereby certify that a true and correct copy of the above Petition for Alternate Service was served by First Class Mail on the following party on the above date:

Alpha-Centurion Security, Inc.
c/o Joanna M. Small, President
224 Glendale Road
Havertown, PA 19093

KLINE & SPECTER, P.C.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
and	:	
ALPHA-CENTURION SECURITY, INC.	:	
d/b/a ALPHA CENTURY SECURITY, INC.	:	
Defendants	:	

A F F I D A V I T

COMMONWEALTH OF PENNSYLVANIA	:	
	:	SS
COUNTY OF PHILADELPHIA	:	

Kyle B. Nocho, Esquire, being duly sworn according to law, deposes and says he is the attorney for Minor-Plaintiff M.B. and he has made a good faith investigation to ascertain the present address of Joanna Small, owner of Defendant Alpha-Centurion Security, Inc. Counsel for Minor-Plaintiff further avers to the best of his knowledge, information and belief that the current address of Joanna Small is 224 Glendale Road, Havertown, Pennsylvania 19083, where service of the Amended Complaint was attempted multiple times, to no avail.

KLINE & SPECTER, P.C.

Kyle Nocho

KYLE B. NOCHO, ESQUIRE

Attorneys for Minor-Plaintiff

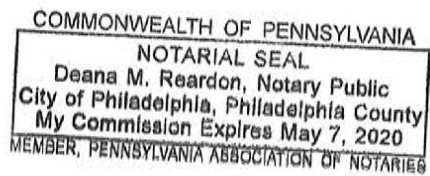
SWORN TO AND SUBSCRIBED

BEFORE ME THIS 4

DAY OF Dec., 2017

Deana Reardon

Notary Public



VERIFICATION

I, KYLE B. NOCHO, hereby state that I am the attorney in the within matter, and as such verify that the statements made in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO

DATE: December 4, 2017

EXHIBIT A

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL

Defendants

PHILADELPHIA COUNTY JUDICIAL RECORDS
COURT OF COMMON PLEAS
JULY 2, 2021 10:05 am
CLERK OF COURT
J. FORTE

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

STIPULATION

BY WAY OF STIPULATION AND AGREEMENT, amongst the parties by the signatures of the undersigned counsel, it is hereby **STIPULATED AND AGREED** by consent of the parties that Minor-Plaintiff M.B., by and through her Guardian William A. Calandra, Esquire shall and may amend the Complaint to name Alpha-Centurion Security, Inc., possibly otherwise known as Alpha Century Security, Inc., as a defendant.

KLINE & SPECTER, P.C.

Thomas R. Kline
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
*Attorneys for Minor-Plaintiff M.B.,
Minor by her Guardian, William A.
Calandra, Esquire*

Date:

7/7/17

BLANK ROMELLO

Grant S. Palmer
GRANT S. PALMER, ESQUIRE
JAMES J. QUINLAN, ESQUIRE
JUSTINA L. BYERS, ESQUIRE
DANIEL E. OBERDICK, ESQUIRE
*Attorneys for Defendants Roosevelt Inn
LLC d/b/a Roosevelt Inn and Roosevelt Inn
Café, Roosevelt Motor Inn, Inc. d/b/a
Roosevelt Motor Inn, UFVS Management
Company, LLC and Yagna Patel*

Date:

7/17/17

Case ID: 170300712

Case ID: 170300712

Control No.: 17120686

EXHIBIT B

SEP: 12. 2017 12:11PM

KLINE & SPECTER P C

NO. 322 P. 2

0017-712

miller
9/10

IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL

In # 381696 52.00

9-5-17

1 copy

M.B.

Plaintiff

March

TERM, 20 17

v.

NO. 00712

Roosevelt Inn, et. al.

Defendant

RETURN OF SERVICE/AFFIDAVIT

I, Deputy James R Miller, hereby certify that I served a true and correct copy of the Complaint / Notice of Appeal / Rule on ALPHA-CENTURION SECURITY, INC.
(Insert Name of Party)

1) By handing a copy to the Defendant / Appellee, ALPHA-CENTURION SECURITY, INC.
on the ____ day of _____, 20____, at _____ AM/PM, at
3720 WEST CHESTER PIKE, NEWTOWN SQ, PA 19073, Philadelphia, PA.

2) By handing a copy to _____, an adult
member of the family/adult person in charge of Defendant's / Appellee's residence,
on the ____ day of _____, 20____, at _____ AM/PM, at
3720 WEST CHESTER PIKE, NEWTOWN SQ, PA 19073, Philadelphia, PA.

I verify that the statements in this Return of Service are true and correct. I further verify that I am an adult over the age of 18 and not related to any party in this action. I understand that this unsworn document contains statements that are made subject to the penalties of 18 P.C.S. §4904 relating to unsworn falsification to authorities.

Sworn to and Affirmed

This 19 day SEPT. 2017

Notary Public
(SEAL)

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
KENDALL F GALLAGHER
Notary Public
MEDIA BORO, DELAWARE COUNTY
My Commission Expires Dec 20, 2019

Return of Service - rev. 4-27-15

(Sign)

(Print Name)

9-15-17 11:25 AM

Case ID: 170300712

Control No.: 17120686

EXHIBIT C

0017-712

IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL

Ans #382789 52.00
9-27-17 1 copy

M.B.

Plaintiff

v.

March TERM, 20 17

NO. 00712

Roosevelt Inn, et al.

Defendant

RETURN OF SERVICE/AFFIDAVIT

I, _____, hereby certify that I served a true and correct copy of the Complaint / Notice of Appeal / Rule on Alpha-Centurion Security, Inc.
dba Alpha Century Security, Inc.
c/o Joanna M. Small, President

1) By handing a copy to the Defendant / Appellee, c/o Joanna M. Small, President

on the ____ day of _____, 20____, at _____ AM/PM, at

224 Glendale Rd, Havertown, PA 19083
Philadelphia, PA.

2) By handing a copy to _____, an adult

member of the family/adult person in charge of Defendant's / Appellee's residence,

on the ____ day of _____, 20____, at _____ AM/PM, at

_____, Philadelphia, PA.

I verify that the statements in this Return of Service are true and correct. I further verify that I am an adult over the age of 18 and not related to any party in this action.

I understand that this unsworn document contains statements that are made subject to the penalties of 18 P.C.S. §4904 relating to unsworn falsification to authorities.

Sworn to and Affirmed
This 30th day October 2017

Grace M. Speck
Notary Public

(SEAL) GRACE M. SPECK
NOTARY PUBLIC
PENNSYLVANIA

Return of Service - re Notary Public
MEDIA BORO., DELAWARE COUNTY
My Commission Expires Aug 3, 2018

Not served 10/26/17. Made multiple attempts including weekends. No response. DEF has refused to open door before. Refused to accept service before as well.
[Signature] (Sign) Service before as well
A. Biardi (Print Name)

NOTARY SEAL
GRACE M. SPECK
NOTARY PUBLIC
PENNSYLVANIA
MEDIA BORO., DELAWARE COUNTY
My Commission Expires 8/3/18

Case ID: 170300712

Control No.: 17120686

PHILADELPHIA COURT OF COMMON PLEAS PETITION/MOTION COVER SHEET

FOR COURT USE ONLY	
ASSIGNED TO JUDGE:	ANSWER/RESPONSE DATE:
<i>Do not send Judge courtesy copy of Petition/Motion/Answer/Response. Status may be obtained online at http://courts.phila.gov</i>	

CONTROL NUMBER:

17120686

**(RESPONDING PARTIES MUST INCLUDE THIS
NUMBER ON ALL FILINGS)**

March 2017
Month Term, Year
No. 00712

B. ETAL VS ROOSEVELT INN LLC ETAL

Name of Filing Party:

ALPHA-CENTURION SECURITY, INC.-DFT**INDICATE NATURE OF DOCUMENT FILED:**

☐ Petition (*Attach Rule to Show Cause*) ☐ Motion
☒ Answer to Petition ☐ Response to Motion

Has another petition/motion been decided in this case? ☐ Yes ☐ NoIs another petition/motion pending? ☐ Yes ☐ No

If the answer to either question is yes, you must identify the judge(s):

TYPE OF PETITION/MOTION (see list on reverse side)		PETITION/MOTION CODE (see list on reverse side)
ANSWER (MOTION/PETITION) FILED		MTANS
ANSWER / RESPONSE FILED TO (Please insert the title of the corresponding petition/motion to which you are responding): MTSVR - MOTION FOR ALTERNATIVE SERVICE		
I. CASE PROGRAM DAY FORWARD/MAJOR JURY PROGRAM Court Type: <u>JUDGE LISA RAU</u> Applicable Petition/Motion Deadline: <u>N/A</u> Has deadline been previously extended by the Court: <u>N/A</u>	II. PARTIES (<i>required for proof of service</i>) (Name, address and telephone number of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.) NADEEM A BEZAR KLINE & SPECTER, P.C. 1525 LOCUST STREET, PHILADELPHIA PA 19102 JUSTINA L BYERS ONE LOGAN SQUARE, PHILADELPHIA PA 19103 THOMAS P WAGNER MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN 2000 MARKET STREET, 23RD FLOOR , PHILADELPHIA PA 19103	
III. OTHER		

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, will be served upon all counsel and unrepresented parties as required by rules of Court (see PA. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, moving party verifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

(Attorney Signature/Unrepresented Party)

December 15, 2017
(Date)

THOMAS P. WAGNER
(Print Name)

(Attorney I.D. No.)

**The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date.
No extension of the Answer/Response Date will be granted even if the parties so stipulate.**

Civil Administration

C. KEENAN

M.B. minor by her Guardian, WILLIAM A. CALANDRA, ESQUIRE	:	PHILADELPHIA COUNTY
	:	COURT OF COMMON PLEAS
	:	
Plaintiff	:	MARCH TERM, 2017
	:	
v.	:	
	:	
ROOSEVELT INN LLC d/b/a ROOSEVELT INN and ROOSEVELT MOTOR INN, INC. d/b/a ROOSEVELT MOTOR INN and UFVS MANAGEMENT COMPANY, LLC and YAGNA PATEL and ALPHA- CENTURION SECURITY, INC. d/b/a ALPHA CENTURY SECURITY, INC.	:	NO. 00712
	:	
	:	<u>JURY TRIAL DEMANDED</u>
	:	
Defendants	:	

ORDER

AND NOW, this _____ day of _____ 2017, upon consideration of Plaintiff's Petition for Alternative Service, and the Response of Defendant, Alpha-Centurion Security, Inc., in Opposition thereto, it is hereby **ORDERED** and **DECREED** that Plaintiff's Petition is **DENIED as moot** and **Alpha-Centurion Security, Inc. is deemed served as of the date of this Order.**

BY THE COURT:

J.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: Thomas P. Wagner, Esquire

Identification No.: 27145

BY: Robert W. Stanko, Esquire

Identification No. 208830

BY: Melanie J. Foreman, Esquire

Identification No.: 317951

2000 Market Street, Suite 2300

Philadelphia PA 19103

(215) 575-2600

Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)

M.B. minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

Plaintiff

v.

ROOSEVELT INN LLC d/b/a ROOSEVELT
INN and ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN and
UFVS MANAGEMENT COMPANY, LLC
and YAGNA PATEL and ALPHA-
CENTURION SECURITY, INC. d/b/a ALPHA
CENTURY SECURITY, INC.

Defendants

: PHILADELPHIA COUNTY
: COURT OF COMMON PLEAS

:
: MARCH TERM, 2017

:
: NO. 00712

:
: JURY TRIAL DEMANDED

**RESPONSE OF DEFENDANT, ALPHA-CENTURION
SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION
SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.), IN
OPPOSITION TO PLAINTIFF'S PETITION FOR ALTERNATIVE SERVICE**

Pursuant to Pennsylvania Rule of Civil Procedure 430(a), Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.) ("Alpha-Centurion"), by and through its counsel, Marshall, Dennehey, Warner, Coleman & Goggin, hereby objects to Plaintiff's Petition for Alternative Service, and, in support thereof, avers as follows:

1. On information and belief, admitted only that Plaintiff's Complaint alleges sex trafficking of minor-Plaintiff at the Roosevelt Inn at 7600 Roosevelt Boulevard, Philadelphia, PA 19152. Plaintiff's allegations are denied.

2. Denied. After reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

3. Admitted in part and denied in part. Admitted only that Alpha-Centurion provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract. As to the remainder of the corresponding allegations, after reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

4. Denied. After reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

5. Denied. After reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

6. Denied. Joanna Small is the President of Alpha-Centurion Security, Inc. To the extent further answer is necessary, after reasonable investigation, Alpha-Centurion is without

knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

7. Denied. After reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

8. Denied. After reasonable investigation, Alpha-Centurion is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

9. Denied. Joanna Small is not the defendant here. The defendant Alpha-Centurion is not evading service of process. On the contrary, prior to the filing of the instant motion, counsel for Alpha-Centurion agreed to accept service on behalf of Alpha-Centurion. Indeed, counsel for Alpha-Centurion advised Plaintiff's counsel by letter on December 4, 2017, that Alpha-Centurion had authorized counsel to accept service. *See* Letter to Plaintiff's Counsel Dated December 4, 2017 and Accompanying Electronic Mail Receipt, collectively attached hereto as Exhibit A.

10. Denied. Plaintiff's allegations of prejudice are specifically denied. Prior to Plaintiff's filing of the instant motion, counsel for Alpha-Centurion agreed to accept service on behalf of Alpha-Centurion and thus Plaintiff is not prejudiced in any way. It is defendant who has been prejudiced by being compelled to respond to this unnecessary motion. *See* Exhibit A.

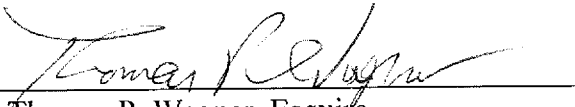
11. Admitted only that Plaintiff seeks the relief as asserted. Specifically denied that such relief is warranted or necessary, given the undersigned counsel's agreement to accept service on behalf of Alpha-Centurion. *See* Exhibit A. Plaintiff is not acting in good faith in seeking alternative service and any claims of prejudice are disingenuous. *See, e.g. Century Sur. Co. v. Essington Auto Ctr., LLC*, 140 A.3d 46, 54 (Pa. Super. 2016) (reversing the trial court because Century Surety "did not engage in a good faith attempt to provide [opposing party] actual notice" when it knew that the opposing party was represented by counsel and nevertheless sought alternative service).

WHEREFORE, Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.), respectfully requests that this Honorable Court deny Plaintiff's Petition as moot.

Respectfully submitted,

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: _____


Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Attorneys for Defendant,
Alpha-Centurion Security, Inc.
(incorrectly named as Alpha-Centurion
Security, Inc. d/b/a Alpha Century Security)

Dated: _____

12/15/17

CERTIFICATE OF SERVICE

I, Thomas P. Wagner, hereby certify that a true and correct copy of the Response of, Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.), in Opposition to Plaintiff's Petition for Alternative Service was served by electronic filing to all parties listed below on the date set forth below:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19101
Attorneys for minor-Plaintiff

Grant S. Palmer, Esquire
James J. Quinlan, Esquire
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Roosevelt Inn and Roosevelt Inn Café,
Roosevelt Motor Inn, Inc. d/b/a Roosevelt
Motor Inn, UFVS Management Company,
LLC and Yagna Patel*

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: 

Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Attorneys for Defendant,
Alpha-Centurion Security, Inc.
(incorrectly named as Alpha-Centurion
Security, Inc. d/b/a Alpha Century Security)

Dated: 12/15/17

LEGAL/I13908138.v1

EXHIBIT "A"

Kalin, Monica M.

From: Kalin, Monica M. [MMKalin@MDWCG.com]
Sent: Monday, December 04, 2017 11:48 AM
To: Nadeem.Bezar@KlineSpecter.com
Cc: Quinlan@BlankRome.com; Wagner, Thomas P.; Foreman, Melanie J.
Subject: M.B., et al. v. Alpha-Centurion Security, Inc., et al.
Attachments: MB - Letter to Bezar re request to accept service of complaint.pdf

MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN ATTORNEYS AT LAW PA NJ DE OH FL NY	
Monica M. Kalin <i>Administrative Assistant</i> e-mail website	2000 Market St. Suite 2300 Philadelphia, PA 19103 Direct: (215) 575-2875 Main: (215) 575-2600 Fax: (215) 575-0856

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**MARSHALL DENNEHEY
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Scranton	Tampa
NEW JERSEY	NEW YORK
Mount Laurel	Long Island
Roseland	New York City
DELAWARE	Westchester
Wilmington	

December 4, 2017

VIA: E-MAIL - Nadeem.Bezar@KlineSpecter.com and U.S. MAIL

Nadeem A. Bezar, Esquire
Kline & Specter, PC
1525 Locust Street, 19th Floor
Philadelphia, PA 19102

**RE: M.B., et al. v. Alpha-Centurion Security, Inc., et al.
PCCP; March Term, 2017; No. 00712
Our File No.: 02983.00316**

Dear Mr. Bezar:

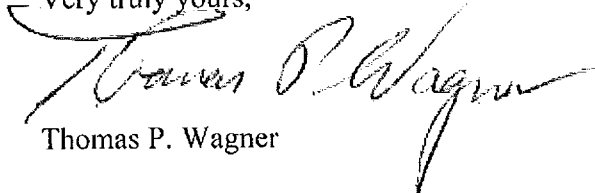
As previously discussed, we represent defendant, Alpha-Centurion Security, Inc., in the above-captioned case. You requested that we accept service of the Complaint on behalf of our client. As promised, I have discussed this with our client representatives, and I am pleased that advise that we are now authorized to accept service as you requested, subject to certain conditions described below.

In return for our agreement to accept service, we request a period of thirty (30) days in which to answer, plead or otherwise move. This thirty days will begin on the day that service of process is delivered to our office.

In addition, this agreement to accept service of process shall not constitute a waiver of any defense other than service of process itself. We also request from you, as previously discussed, copies of all written discovery that has been exchanged between and among the parties to date.

Assuming that these conditions are agreeable to you, please send your Service of Process to us and we will proceed accordingly. Thank you.

Very truly yours,


Thomas P. Wagner

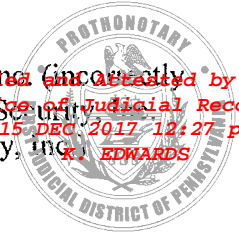
TPW/mmk

cc: James J. Quinlan, Esquire (via: e-mail - Quinlan@BlankRome.com and U.S. Mail

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: Thomas P. Wagner, Esquire
Identification No.: 27145
BY: Robert W. Stanko, Esquire
Identification No. 208830
BY: Melanie J. Foreman, Esquire
Identification No.: 317951
2000 Market Street, Suite 2300
Philadelphia PA 19103
(215) 575-2600

Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)
15 DEC 2017 12:27 pm
EDWARDS



M.B. minor by her Guardian, WILLIAM A. CALANDRA, ESQUIRE	:	PHILADELPHIA COUNTY COURT OF COMMON PLEAS
	:	
v.	:	MARCH TERM, 2017
	:	
ROOSEVELT INN LLC d/b/a ROOSEVELT INN and ROOSEVELT MOTOR INN, INC. d/b/a ROOSEVELT MOTOR INN and UFVS MANAGEMENT COMPANY, LLC and YAGNA PATEL and ALPHA- CENTURION SECURITY, INC. d/b/a ALPHA CENTURY SECURITY, INC.	:	NO. 00712 <u>JURY TRIAL DEMANDED</u>

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter our appearance on behalf of Defendant, Alpha-Centurion Security, Inc.
(incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.), in the
above-captioned matter.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: Thomas P. Wagner
Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)


Dated: 12/15/17

M.B. minor by her Guardian, WILLIAM A. CALANDRA, ESQUIRE	:	PHILADELPHIA COUNTY
	:	COURT OF COMMON PLEAS
	:	
Plaintiff	:	MARCH TERM, 2017
	:	
v.	:	
	:	
ROOSEVELT INN I.L.C d/b/a ROOSEVELT INN and ROOSEVELT MOTOR INN, INC. d/b/a ROOSEVELT MOTOR INN and UFVS MANAGEMENT COMPANY, LLC and YAGNA PATEL and ALPHA- CENTURION SECURITY, INC. d/b/a ALPHA CENTURY SECURITY, INC.	:	NO. 00712
	:	
	:	<u>JURY TRIAL DEMANDED</u>
	:	
Defendants	:	

ORDER

AND NOW, this **21st day of December,** 2017, upon consideration of Plaintiff's Petition for Alternative Service, and the Response of Defendant, Alpha-Centurion Security, Inc., in Opposition thereto, it is hereby **ORDERED** and **DECREED** that Plaintiff's Petition is **DENIED** as moot and Alpha-Centurion Security, Inc. is deemed served as of the date of this Order.

BY THE COURT:


 Lisa M. Rau, J.

B. Etal Vs Roosevelt In-ORDER



17030071200049

Case ID: 170300712
 Control No.: 17120686